

TSD File Inventory Index

Date: August 22, 2002

Initial: C. M. Hernandez

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Facility Identification Number: <u>ILD 000 646-9830</u>			
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Note: Transmittal Letter to Be Included with Reports.

Comments: _____

LAND AND CHEMICALS DIVISION

Type of Document: Pre-filing Notice/Opportunity to Confer

Name of Document: Ortek, Inc. (ILD000646788)

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>Brian Kennedy</u>	<u>8/13/13</u>
SECTION APA:	<u>Rhy B. King</u>	<u>8/15/13</u>
SECTION CHIEF:	<u>[Signature]</u>	<u>08/15/13</u>
BRANCH APA:	<u></u>	<u></u>
BRANCH CHIEF:	<u>[Signature]</u>	<u>8/31/13</u>
DIVISION APA:	<u></u>	<u></u>
DIVISION DIRECTOR:	<u></u>	<u></u>
OTHERS:	<u>Robert Peachey, ORC</u> <u>see attached concurrence</u>	<u>8/13/13</u>
DRA:	<u></u>	<u></u>
RA:	<u></u>	<u></u>

RETURN TO: 08126

PHONE: 3-4383

COMMENTS:

Anticipated Complaint/CAFO w/ penalty for violations
related to hazardous waste storage and used oil rebuttable
presumption requirements. SNC Memo approved 4/3/13.
Complaint/compliance order draft available upon request
Draft penalty narrative enclosed for reference.

Kennedy, Brian

From: Peachey, Robert
Sent: Tuesday, August 13, 2013 10:47 AM
To: Kennedy, Brian
Subject: RE: Ortek Docs

Yeah, I think it looks good – let's get it going. Thanks, Brian!

Robert M. Peachey
Office of Regional Counsel
U.S. EPA Region 5 (C-14J)
77 W. Jackson Blvd.
Chicago, Illinois 60604
Phone: (312) 353.4510
Fax: (312) 692.2422
E-mail: peachey.robert@epa.gov

The preceding email message may contain information that is privileged or otherwise exempt from disclosure under applicable law. Do not disclose without consulting Office of Regional Counsel. If you have received this message in error, please do not read it, reply to the sender that you have received it in error, and erase or otherwise destroy the message.

From: Kennedy, Brian
Sent: Tuesday, August 13, 2013 10:31 AM
To: Peachey, Robert
Subject: FW: Ortek Docs

Hey Bob – if you're alright with this Pre-filing notice, I can submit it today; my supervisor doesn't necessarily need to see a draft complaint with it.

Thanks

Brian Kennedy
Environmental Engineer
U.S. EPA - Region 5
77 West Jackson Blvd. (LR-8J)
Chicago, Illinois 60604
Phone: 312 | 353-4383

From: Kennedy, Brian
Sent: Wednesday, August 07, 2013 11:50 AM
To: Peachey, Robert
Subject: Ortek Docs

Hi Bob,

Here are the current documents.

The pre-filing notice kept most of your tweaks, although LCD correspondence rules require we call additional documents to a letter "enclosures" and not "attachments." And you're right, it was 37 and not 73. Please let me know if I have your concurrence on this pre-filing notice.

I've also kept most of your changes to the complaint draft. Please see my new comments regarding the compliance order.

Thanks,

Brian Kennedy

Environmental Engineer

U.S. EPA - Region 5

77 West Jackson Blvd. (LR-8))

Chicago, Illinois 60604

Phone: 312 | 353-4383



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 03 2013

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7679 6101
RETURN RECEIPT REQUESTED

Mr. Lowell Aughenbaugh
President
Ortek, Inc.
7601 West 47th Street
McCook, Illinois 60525

Re: Notice of Intent to File Civil Administrative Complaint against
Ortek, Inc.
EPA ID No.: ILD000646786

Dear Mr. Aughenbaugh:

The U. S. Environmental Protection Agency (EPA) plans to file an administrative complaint for civil penalties against Ortek, Inc. ("Ortek" or "you"). We will allege that you violated the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 - 6992k, as amended, as described in the enclosed Notice of Violation previously issued to you on January 24, 2013. RCRA provides a cradle-to-grave framework to ensure proper management of hazardous wastes and used oil which, if handled in an unsafe manner, could present risks to humans and the environment. This letter also informs you that EPA deems Ortek to be a Significant Non-Complier under RCRA.

Based on information currently available to us, we plan to propose a penalty of \$512,437 in the complaint. This letter is not a demand to pay a penalty. We will not ask you to pay a penalty until we file the complaint or a final order. Before filing the complaint, we are giving you the opportunity to present any information that you believe we should consider. Relevant information might include evidence that you did not violate the law; evidence that you relied on compliance assistance from EPA or a state agency; evidence that we identified the wrong party; or financial data bearing on your ability to pay a penalty.

If you believe that you will be unable to pay a \$512,437 penalty because of financial reasons, please send us certified, complete financial statements including balance sheets, income statements and all notes to the financial statements, and your company's signed income tax returns with all schedules and amendments for the past three years. Also, please complete the enclosed Form 4506-T (print form from <http://www.irs.gov/pub/irs-pdf/f4506t.pdf>) authorizing the Internal Revenue Service to release transcripts of your tax returns for the past same three years.

Also, as part of a settlement, you may voluntarily propose to undertake an environmentally beneficial project related to the violation(s) in exchange for mitigation of the penalty. A

Supplemental Environmental Project (SEP) furthers EPA's goal of protecting and enhancing public health and the environment. See this EPA web link for information on SEPs:
<http://www.epa.gov/enforcement/sep.html>.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If you fail to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it.

Within 10 calendar days after you receive this letter, please send any written response to:

Brian Kennedy
U.S. Environmental Protection Agency
Region 5 (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

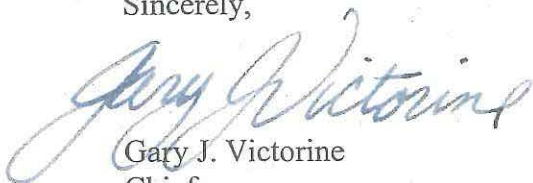
If you want to confer with us, you should contact Brian Kennedy, of the RCRA Branch, in writing within 10 calendar days after you receive this letter. Please be advised that this conference is not a settlement negotiation covered by Federal Rule of Evidence 408; we may use any information you submit in support of an administrative, civil or criminal action. After or during the conference (or after you have submitted a written reply if we do not have a conference), we may give you the opportunity to engage in settlement negotiations before we file the complaint. If pre-filing settlement negotiations commence and are successful, a settlement agreement can be filed under EPA regulations at 40 C.F.R. § 22.13(b).

If you do not respond to this letter, EPA may file a complaint without further notice against Ortek as authorized under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).

If you have any questions, please telephone Robert M. Peachey, Associate Regional Counsel, at (312) 353-4510.

Thank you for your prompt attention to this matter.

Sincerely,



Gary J. Victorine
Chief,
RCRA Branch

Enclosures

cc: Anna VanOrden, IEPA – Des Plaines District Office (anna.vanorden@illinois.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
JAN 24 2013

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7669 2564
RETURN RECEIPT REQUESTED

Mr. Lowell Aughenbaugh
President
Ortek, Inc.
7601 West 47th Street
McCook, Illinois 60525

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILD000646786

Dear Mr. Aughenbaugh:

On December 9, 14 and 21, 2011 and January 30, 2012, a representative of the U.S. Environmental Protection Agency (EPA) inspected Ortek, Inc. (hereinafter "Ortek" or "you") located in McCook, Illinois. The purpose of the inspection was to evaluate Ortek's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations regarding the generation, treatment and storage of hazardous waste, including used oil. We have enclosed a copy of the inspection report and checklists for your reference.

Based on information provided by Ortek personnel, a review of records, a follow-up request for information dated September 12, 2012, and physical observations made by the inspector at the time of the investigation, EPA has determined that Ortek is in violation of hazardous waste management requirements of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR). Specifically, EPA finds that Ortek failed to meet the requirements of a used oil processor, and is in violation of the following regulations:

1. In order to operate as a used oil processor, owners or operators must have a contingency plan for the facility designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil or surface water. See 35 IAC § 739.152(b)(1)(A) [40 CFR § 279.52(b)(1)(i)]. However, if the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan, the owner or operator need only amend that plan to incorporate used oil management provisions that are sufficient to comply with the requirements of a 35 IAC § 739.152(b). See 35 IAC § 739.152(b)(2)(B) [40 CFR § 279.52(b)(2)(ii)].

At the time of inspection, Ortek presented a copy of their SPCC plan. However, the SPCC plan was not amended to comply with the provisions of a contingency plan contained in IAC § 739.152(b)(2) [40 CFR § 279.52(b)(2)], nor was there a separate contingency plan available. Ortek, therefore, failed to meet the general facility standards of a used oil processor and is in violation of the abovementioned requirement.

2. In order to operate as a used oil processor, containers used to store or process used oil must be equipped with a secondary containment system which has at a minimum, dikes, berms or retaining walls as well as a floor that must cover the entire area within the dike, berm or retaining wall. See 35 IAC § 739.154(c)(1)(A) [40 CFR § 279.54(c)(1)]. It is also required that the entire containment system, including walls and floor, must be sufficiently impervious to used oil to prevent any used oil released from the containment system from migrating out the system to the soil, groundwater or surface water. See 35 IAC § 739.154(c)(2) [40 CFR § 279.54(c)(2)].

At the time of inspection, two 5-gallon pails and one 55-gallon drum of used oil near the off-loading pump near the 500 series tanks were not in secondary containment. Additionally, numerous totes with used oil near Tanks 100 and 101 sat on a concrete pad without secondary containment. Ortek, therefore, failed to comply with used oil management standards and is in violation of the abovementioned requirements.

3. In order to operate as a used oil processor, existing aboveground tanks must have a secondary containment system which has at a minimum, dikes, berms, or retaining walls and a floor that must cover the entire area within the dike, berm, or retaining wall except areas where existing portions of the tank meet the ground. See 35 IAC § 739.154(d)(1)(A) [40 CFR § 279.54(d)(1)]. It is also required that the entire containment system, including walls and floor, must be sufficiently impervious to used oil to prevent any used oil released into the containment system from migrating out the system to the soil, groundwater, or surface water. See 35 IAC § 739.154(d)(2) [40 CFR § 279.54(d)(2)].

At the time of inspection, Tanks 1-10, 100, 101, and 120-146 were not in secondary containment sufficiently impervious to prevent used oil from reaching soil. Additionally, an open-top tank covered with a tarp and plywood near the train tracks along the southern border of the facility contained used oil and was not in secondary containment. Ortek, therefore, failed to comply with used oil management standards and is in violation of the abovementioned requirements.

4. In order to operate as a used oil processor, containers and aboveground tanks used to store used oil at processing facilities must be labeled or marked clearly with the words "Used Oil." See 35 IAC § 739.154(f)(1) [40 CFR § 279.54(f)(1)].

At the time of inspection, a bucket catching drippings from Tank 101 was not labeled "Used Oil." Numerous buckets and one 55-gallon drum near the triple basin were not labeled "Used Oil." Various 5-gallon gallon buckets and one 55-gallon drum near the off-

loading area by Tanks 1-10 and 120-146 were not labeled "Used Oil." Two 5-gallon pails and one 55-gallon drum near the 500-series tanks were not labeled "Used Oil."

Additionally, oily debris observed in a truck bed was transferred to a nearby tote and 55-gallon drum over the course of the inspection. However, the tote and 55-gallon drum were not labeled "Used Oil." Ortek, therefore, failed to comply with used oil management standards and is in violation of the abovementioned requirements.

5. To ensure that used oil is not a hazardous waste under the rebuttable presumption of 35 IAC § 739.110(b)(1)(B), the owner or operator of a used oil processing facility must determine whether the total halogen content of used oil managed at the facility is above or below 1,000 ppm. See 35 IAC § 739.153(a) [40 CFR § 279.53(a)]. The owner or operator must make this determination by testing the used oil, or applying knowledge of the halogen content of the used oil in light of the materials or processes used. See 35 IAC §§ 739.153(b)(1) and (2) [40 CFR §§ 279.53(b)(1) and (2)].

At the time of inspection, Ortek presented their "Waste Analysis Plan," which contains a "Material Profile Sheet" that must be completed for all incoming used oil streams. Part J of the "Material Profile Sheet" mentions the rebuttable presumption for used oil, but it does not request a total halogen determination for the used oil or request a basis for knowledge of the used oil's halogen content. Part J also does not provide a location where total halogens may be recorded, nor is there a location elsewhere on the sheet. Total Halogens are not mentioned elsewhere on the "Material Profile Sheet."

Additionally, Part C of the "Material Profile Sheet" requests general information of the process that generated the used oil, but does not request any information or documentation about the process or its materials used that could lead to an accurate determination of the used oil's halogen content, e.g., the chemical composition of the virgin oil, whether used oil from the same process had been previously analyzed and where to find such information, a certification from the generator that the total halogen content of the used oil is below 1,000 ppm, or if the used oil had been mixed with other waste streams on the generator's site.

Information requested on the "Material Profile Sheet" does not allow Ortek to properly apply knowledge of the halogen content of the used oil in light of the materials or processes used, nor is it adequate to rebut the presumption of used oil mixture with halogenated hazardous waste listed in Subpart D of 35 IAC § 721 [Subpart D of 40 CFR Part 261]. Ortek, therefore, is in violation of the abovementioned requirements.

6. In order to operate as a used oil processor, owners or operators must ensure that used oil managed at the facility is not a hazardous waste by determining whether the total halogen content is above or below 1,000 ppm. If the used oil contains greater than or equal to 1,000 ppm total halogens, it is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste. The owner or operator may rebut this

presumption by demonstrating that the used oil does not contain hazardous waste. See 35 IAC §§ 739.153(a) and (c) [40 CFR §§ 279.53(a) and (c)].

Test results performed by Ortek on several watery oil streams indicate concentrations of total halogens over 1,000 ppm. On October 5, 2011, a "Daily Received Log Used Oils" sheet indicates that a 3,500 gallon shipment from International Titanium Powder had a chlorine concentration of 7,650 ppm (Ticket # 96760). On October 12, 2011, another "Daily Received Log Used Oils" sheet indicated three shipments also had chlorine concentrations over 1,000 ppm:

- Ticket # 96817 - 2900 gallons from Switch Craft with 3,899 ppm chlorine
- Ticket # 96819 - 4800 gallons from Laser Technology with 3,288 ppm chlorine
- Ticket # 96821 - 850 gallons from HazChem with 1,935 ppm chlorine

All shipments above were placed in Tank 101. At the time of inspection, no information was available to rebut the presumption that the above materials were not mixed with halogenated hazardous wastes. In response to an information request on November 12, 2012, Ortek could provide EPA no further information on these shipments. Ortek could not demonstrate the used oil was not mixed with halogenated hazardous waste and is therefore in violation of the abovementioned requirement.

7. In order to operate as a used oil processor, owners or operators must develop and follow a written used oil analysis plan describing the procedures that will be used to comply with the analysis requirements of the rebuttable presumption for used oil and, if applicable, on-specification used oil fuel. See 35 IAC § 739.155(a) and (b) [40 CFR § 279.55(a) and (b)]. When sample analyses are used to make the determination of used oil as on-specification fuel, the analysis plan must describe the method by which representative samples will be obtained, the location of the sampling and its frequency, and the methods used to analyze used oil for the parameters specified in 35 IAC § 739.172 [40 CFR § 279.72]. See 35 IAC §§ 739.155(b)(2)(A)-(D) [40 CFR §§ 279.55(b)(2)(i)-(iv)].

On November 12, 2012, EPA received Ortek's most recent "Waste Analysis Plan." As outlined in Violation 5 above, the "Material Profile Sheet" in the "Waste Analysis Plan" is not adequate to rebut the presumption of used oil mixture with halogenated hazardous waste because the sheet does not request total halogen content or related knowledge. Additionally the section "Outgoing On-Spec Used Oil Analysis Plan" does not describe the method by which representative samples will be obtained, the frequency of sampling, or the analytical method and location by which used oil will be tested to meet the parameters of IAC § 739.172 [40 CFR § 279.72]. Descriptions in the "Waste Analysis Plan" are not suitable to comply with the analysis requirements above. Ortek, therefore, is in violation of this requirement.

8. In order to operate as a used oil processor, the facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden

release of used oil to air, soil, or surface water which could threaten human health or the environment. See 35 IAC § 739.152(a)(1) [40 CFR § 279.52(a)(1)].

At the time of inspection, oil-stained soils were observed near Tanks 120-146. Oil-stained soils were also observed near the triple-basin area and lift-station, and in between Tanks 9 and 133. Ortek, therefore, is in violation of the abovementioned requirement for the general facility standards of used oil processors.

9. No person may conduct any hazardous waste storage, hazardous waste treatment, or hazardous waste disposal without a RCRA permit. See IAC § 703.121(a)(1). Accordingly, owners or operators of hazardous waste management units, including tanks which store hazardous waste, must have permits during the active life of the unit. See IAC § 703.121(b) [40 CFR § 270.1(c)].

At the time of inspection, eight hazardous waste manifests indicated the off-site shipment of D001, D008, and D039 hazardous waste from Ortek Tanks 120, 122, and 146. The manifests were:

- 001528685 GBF on November 1, 2011
- 001528686 GBF on November 2, 2011
- 001528724 GBF on November 7, 2011
- 001528725 GBF on November 8, 2011
- 001528726 GBF on November 9, 2011
- 001528727 GBF on November 10, 2011
- 001528729 GBF on November 11, 2011
- 001528730 GBF on November 14, 2011

These manifests displayed the generator of the hazardous waste to be RS Used Oil Services, Inc. (RS) albeit with the site address of Ortek. When asked about the hazardous waste shipments during the inspection, Ortek personnel indicated the material originally came to Ortek in April and May of 2011 through RS, a used oil transporter which routinely brings used oil to Ortek tanks. Ortek personnel pointed out five incoming shipments in April and May 2011 on an RS Account Statement for Ortek dated 7/7/2011. These five shipments (April 1 and May 2, 6, 9, and 17, 2011) were identified by Ortek personnel as the material that was later shipped off Ortek's site on the hazardous waste manifests above.

In response to an information request on October 10, 2012, RS Used Oil Services provided EPA analytical tests performed by Precision Petroleum Labs, Inc. on September 9, 2011 for material in Ortek Tanks 120, 122, 132, 146 and 500. In addition to demonstrating that the material in Tanks 120, 122 and 146 were characteristic for D001, D008 and D039 hazardous wastes, the results also showed that material in Ortek Tank 132 was characteristic for D001, D007, D008 and D039 hazardous waste. Ortek, therefore was storing hazardous waste in Tanks 120, 122, 132, and 146 without a hazardous waste permit and is in violation of the abovementioned requirements

Additionally, and as outlined in Violation 6 above, Ortek failed to provide information to rebut the presumption of used oil mixture with halogenated hazardous waste for four incoming used oil shipments in October, 2011. The four used oil streams had total halogen concentrations greater than 1,000 ppm and were initially placed in Tank 101. Ortek, therefore, was also storing hazardous waste in Tank 101 without a hazardous waste permit and is in violation of the abovementioned requirements.

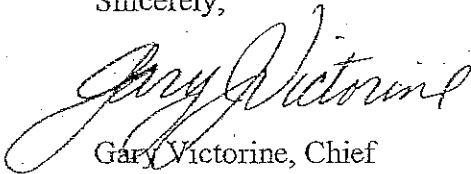
10. Owners or operators of facilities that use tank systems for storing or treating hazardous wastes must follow the regulations of Subpart J of IAC § 725 [Subpart J of 40 CFR § 265].

As outlined in Violation 9 above, Ortek stored hazardous wastes in Tanks 120, 122 and 146 until such wastes were shipped off-site in November, 2011. Ortek also stored hazardous waste in Tank 132 and Tank 101. Ortek, therefore, was storing hazardous waste in Tanks 101, 120, 122, 132, and 146 and was required to meet the hazardous waste storage tank requirements in Subpart J of IAC § 725. Ortek failed to do so. Ortek, therefore, is in violation of the abovementioned requirement.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your written response to Brian Kennedy, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, or if you wish to confer with us regarding the issues stated above or to present any relevant information you believe we should consider, please contact Mr. Kennedy, of my staff, at (312) 353-4383.

Sincerely,



Gary Victorine, Chief
RCRA Branch

Enclosure
Inspection Report and Checklists

cc: Anna VanOrden, IEPA – Des Plaines District Office (anna.vanorden@illinois.gov)

Request for Transcript of Tax Return

OMB No. 1545-1872

▶ Request may be rejected if the form is incomplete or illegible.

Use Form 4506-T to order a transcript or other return information free of charge. See the product list below. You can quickly request transcripts by using our automated self-help service tools. Please visit us at IRS.gov and click on "Order a Transcript" or call 1-800-908-9946. If you need a copy of your return, use Form 4506, Request for Copy of Tax Return. There is a fee to get a copy of your return.

1a Name shown on tax return. If a joint return, enter the name shown first.	1b First social security number on tax return, individual taxpayer identification number, or employer identification number (see instructions)
2a If a joint return, enter spouse's name shown on tax return.	2b Second social security number or individual taxpayer identification number if joint tax return
3 Current name, address (including apt., room, or suite no.), city, state, and ZIP code (see instructions)	
4 Previous address shown on the last return filed if different from line 3 (see instructions)	
5 If the transcript or tax information is to be mailed to a third party (such as a mortgage company), enter the third party's name, address, and telephone number.	

Caution. If the tax transcript is being mailed to a third party, ensure that you have filled in lines 6 through 9 before signing. Sign and date the form once you have filled in these lines. Completing these steps helps to protect your privacy. Once the IRS discloses your IRS transcript to the third party listed on line 5, the IRS has no control over what the third party does with the information. If you would like to limit the third party's authority to disclose your transcript information, you can specify this limitation in your written agreement with the third party.

6 **Transcript requested.** Enter the tax form number here (1040, 1065, 1120, etc.) and check the appropriate box below. Enter only one tax form number per request. ▶

a Return Transcript , which includes most of the line items of a tax return as filed with the IRS. A tax return transcript does not reflect changes made to the account after the return is processed. Transcripts are only available for the following returns: Form 1040 series, Form 1065, Form 1120, Form 1120A, Form 1120H, Form 1120L, and Form 1120S. Return transcripts are available for the current year and returns processed during the prior 3 processing years. Most requests will be processed within 10 business days	<input type="checkbox"/>
b Account Transcript , which contains information on the financial status of the account, such as payments made on the account, penalty assessments, and adjustments made by you or the IRS after the return was filed. Return information is limited to items such as tax liability and estimated tax payments. Account transcripts are available for most returns. Most requests will be processed within 30 calendar days	<input type="checkbox"/>
c Record of Account , which provides the most detailed information as it is a combination of the Return Transcript and the Account Transcript. Available for current year and 3 prior tax years. Most requests will be processed within 30 calendar days	<input type="checkbox"/>
7 Verification of Nonfiling , which is proof from the IRS that you did not file a return for the year. Current year requests are only available after June 15th. There are no availability restrictions on prior year requests. Most requests will be processed within 10 business days	<input type="checkbox"/>
8 Form W-2, Form 1099 series, Form 1098 series, or Form 5498 series transcript. The IRS can provide a transcript that includes data from these information returns. State or local information is not included with the Form W-2 information. The IRS may be able to provide this transcript information for up to 10 years. Information for the current year is generally not available until the year after it is filed with the IRS. For example, W-2 information for 2010, filed in 2011, will not be available from the IRS until 2012. If you need W-2 information for retirement purposes, you should contact the Social Security Administration at 1-800-772-1213. Most requests will be processed within 45 days	<input type="checkbox"/>

Caution. If you need a copy of Form W-2 or Form 1099, you should first contact the payer. To get a copy of the Form W-2 or Form 1099 filed with your return, you must use Form 4506 and request a copy of your return, which includes all attachments.

9 **Year or period requested.** Enter the ending date of the year or period, using the mm/dd/yyyy format. If you are requesting more than four years or periods, you must attach another Form 4506-T. For requests relating to quarterly tax returns, such as Form 941, you must enter each quarter or tax period separately.

Check this box if you have notified the IRS or the IRS has notified you that one of the years for which you are requesting a transcript involved **identity theft** on your federal tax return ☐

Caution. Do not sign this form unless all applicable lines have been completed.

Signature of taxpayer(s). I declare that I am either the taxpayer whose name is shown on line 1a or 2a, or a person authorized to obtain the tax information requested. If the request applies to a joint return, **either** husband or wife must sign. If signed by a corporate officer, partner, guardian, tax matters partner, executor, receiver, administrator, trustee, or party other than the taxpayer, I certify that I have the authority to execute Form 4506-T on behalf of the taxpayer. **Note.** For transcripts being sent to a third party, this form must be received within 120 days of the signature date.

	Phone number of taxpayer on line 1a or 2a
Signature (see instructions)	Date
Title (if line 1a above is a corporation, partnership, estate, or trust)	
Spouse's signature	Date

Section references are to the Internal Revenue Code unless otherwise noted.

What's New

The IRS has created a page on IRS.gov for information about Form 4506-T at www.irs.gov/form4506. Information about any recent developments affecting Form 4506-T (such as legislation enacted after we released it) will be posted on that page.

General Instructions

CAUTION. Do not sign this form unless all applicable lines have been completed.

Purpose of form. Use Form 4506-T to request tax return information. You can also designate (on line 5) a third party to receive the information. Taxpayers using a tax year beginning in one calendar year and ending in the following year (fiscal tax year) must file Form 4506-T to request a return transcript.

Note. If you are unsure of which type of transcript you need, request the Record of Account, as it provides the most detailed information.

Tip. Use Form 4506, Request for Copy of Tax Return, to request copies of tax returns.

Where to file. Mail or fax Form 4506-T to the address below for the state you lived in, or the state your business was in, when that return was filed. There are two address charts: one for individual transcripts (Form 1040 series and Form W-2) and one for all other transcripts.

If you are requesting more than one transcript or other product and the chart below shows two different addresses, send your request to the address based on the address of your most recent return.

Automated transcript request. You can quickly request transcripts by using our automated self-help service tools. Please visit us at IRS.gov and click on "Order a Transcript" or call 1-800-908-9946.

Chart for individual transcripts (Form 1040 series and Form W-2 and Form 1099)

If you filed an individual return and lived in:

Mail or fax to the "Internal Revenue Service" at:

Alabama, Kentucky, Louisiana, Mississippi, Tennessee, Texas, a foreign country, American Samoa, Puerto Rico, Guam, the Commonwealth of the Northern Mariana Islands, the U.S. Virgin Islands, or A.P.O. or F.P.O. address

RAIVS Team
Stop 6716 AUSC
Austin, TX 73301

512-460-2272

Alaska, Arizona, Arkansas, California, Colorado, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Dakota, Utah, Washington, Wisconsin, Wyoming

RAIVS Team
Stop 37106
Fresno, CA 93888

559-456-5876

Connecticut, Delaware, District of Columbia, Florida, Georgia, Maine, Maryland, Massachusetts, Missouri, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Vermont, Virginia, West Virginia

RAIVS Team
Stop 6705 P-6
Kansas City, MO 64999

816-292-6102

Chart for all other transcripts

If you lived in or your business was in:

Mail or fax to the "Internal Revenue Service" at:

Alabama, Alaska, Arizona, Arkansas, California, Colorado, Florida, Hawaii, Idaho, Iowa, Kansas, Louisiana, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, Wyoming, a foreign country, or A.P.O. or F.P.O. address

RAIVS Team
P.O. Box 9941
Mail Stop 6734
Ogden, UT 84409

801-620-6922

Connecticut, Delaware, District of Columbia, Georgia, Illinois, Indiana, Kentucky, Maine, Maryland, Massachusetts, Michigan, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, West Virginia, Wisconsin

RAIVS Team
P.O. Box 145500
Stop 2800 F
Cincinnati, OH 45250

859-669-3592

Line 1b. Enter your employer identification number (EIN) if your request relates to a business return. Otherwise, enter the first social security number (SSN) or your individual taxpayer identification number (ITIN) shown on the return. For example, if you are requesting Form 1040 that includes Schedule C (Form 1040), enter your SSN.

Line 3. Enter your current address. If you use a P. O. box, include it on this line.

Line 4. Enter the address shown on the last return filed if different from the address entered on line 3.

Note. If the address on lines 3 and 4 are different and you have not changed your address with the IRS, file Form 8822, Change of Address.

Line 6. Enter only one tax form number per request.

Signature and date. Form 4506-T must be signed and dated by the taxpayer listed on line 1a or 2a. If you completed line 5 requesting the information be sent to a third party, the IRS must receive Form 4506-T within 120 days of the date signed by the taxpayer or it will be rejected. Ensure that all applicable lines are completed before signing.

Individuals. Transcripts of jointly filed tax returns may be furnished to either spouse. Only one signature is required. Sign Form 4506-T exactly as your name appeared on the origin return. If you changed your name, also sign current name.

Corporations. Generally, Form 4506-T can be signed by: (1) an officer having legal authority to bind the corporation, (2) any person designated by the board of directors or other governing body, or (3) any officer or employee on written request by any principal officer and attested to by the secretary or other officer.

Partnerships. Generally, Form 4506-T can be signed by any person who was a member of the partnership during any part of the tax period requested on line 9.

All others. See section 6103(e) if the taxpayer has died, is insolvent, is a dissolved corporation, or if a trustee, guardian, executor, receiver, or administrator is acting for the taxpayer.

Documentation. For entities other than individuals, you must attach the authorization document. For example, this could be the letter from the principal officer authorizing an employee of the corporation or the letters testamentary authorizing an individual to act for an estate.

Privacy Act and Paperwork Reduction Act

Notice. We ask for the information on this form to establish your right to gain access to the requested tax information under the Internal Revenue Code. We need this information to properly identify the tax information and respond to your request. You are not required to request any transcript; if you do request a transcript, sections 6103 and 6109 and their regulations require you to provide this information, including your SSN or EIN. If you do not provide this information, we may not be able to process your request. Providing false or fraudulent information may subject you to penalties.

Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation, and cities, states, the District of Columbia, and U.S. commonwealths and possessions for use in administering their tax laws. We may also disclose this information to other countries under a tax treaty, to federal and state agencies to enforce federal nontax criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file Form 4506-T will vary depending on individual circumstances. The estimated average time is: **Learning about the law or the form, 10 min.; Preparing the form, 12 min.; and Copying, assembling, and sending the form to the IRS, 20 min.**

If you have comments concerning the accuracy of these time estimates or suggestions for making Form 4506-T simpler, we would be happy to hear from you. You can write to:


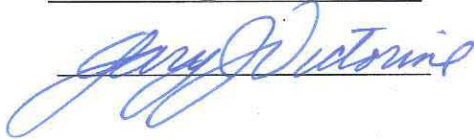
Internal Revenue Service
Tax Products Coordinating Committee
SE:W:CAR:MP:T:M:S
1111 Constitution Ave. NW, IR-6526
Washington, DC 20224

Do not send the form to this address. Instead, see *Where to file* on this page.

LAND AND CHEMICALS DIVISION

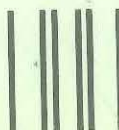
Type of Document: Notice of Violation

Name of Document: Ortek, Inc. (ILD 000646786)

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>Brian Kennedy</u>	<u>1/15/13</u>
SECTION APA:		
SECTION CHIEF:	<u></u>	<u>1/17/13</u>
BRANCH APA:	<u>MG</u>	<u>1/18/13</u>
BRANCH CHIEF:	<u></u>	<u>1/18/13</u>
DIVISION APA:		
DIVISION DIRECTOR:		
OTHERS:	<u>Att. Robert Peachey</u> <u>(concurrent attached)</u>	<u>1/15/13</u>
DRA:		
RA:		
RETURN TO:	<u>Brian Kennedy</u>	
PHONE:	<u>3-4383</u>	

COMMENTS: Note this was in process before recent
formatting changes

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

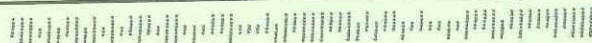
• Sender: Please print your name, address, and ZIP+4 in this box •

Brian Kennedy
U.S.EPA region 5 / LR- 8J
77 W. Jackson Blvd
Chicago, IL 60604

RECEIVED
DIVISION FRONT OFFICE

JAN 29 2012

LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Lowell Aughenbaugh / President
Ortek, Inc
7601 West 47th Street
McCook, IL 60525

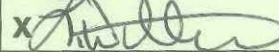
2. Article Number

(Transfer from service label)

7009 1680 0000 7669 2564

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

1/28/13

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes



Re: Ortek NOV
Robert Peachey to: Brian Kennedy

01/15/2013 02:06 PM

Yes, I concur in the NOV. Thanks, Brian. Please cc me on the NOV, too.

--Bob

Robert M. Peachey
Office of Regional Counsel
U.S. EPA Region 5 (C-14J)
77 W. Jackson Blvd.
Chicago, Illinois 60604
Phone: (312) 353.4510
Fax: (312) 692.2422
E-mail: peachey.robert@epa.gov

The preceding email message may contain information that is privileged or otherwise exempt from disclosure under applicable law. Do not disclose without consulting Office of Regional Counsel. If you have received this message in error, please do not read it, reply to the sender that you have received it in error, and erase or otherwise destroy the message.

Brian Kennedy	Bob, I made the final suggested changes. It's all...	01/15/2013 01:53:58 PM
---------------	--	------------------------

From: Brian Kennedy/R5/USEPA/US
To: Robert Peachey/R5/USEPA/US@EPA,
Date: 01/15/2013 01:53 PM
Subject: Re: Ortek NOV

Bob,

I made the final suggested changes. It's all set to go. May I use this email as your concurrence?

Brian Kennedy
Environmental Engineer
U.S. EPA - Region 5
77 W. Jackson Blvd. (LR-8J)
Chicago, Illinois 60604
Phone: (312) 353-4383

Robert Peachey	Dear Brian: Excellent work on the NOV -- I had h...	01/15/2013 12:16:30 PM
Brian Kennedy	Hi Bob, I made your suggested changes to the p...	01/14/2013 02:18:10 PM
Robert Peachey	Dear Brian: I agree with your recommended par...	01/14/2013 12:30:44 PM
Brian Kennedy	Hi Bob, I read over your email regarding Ortek's...	01/11/2013 11:58:38 AM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JAN 24 2013

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7669 2564
RETURN RECEIPT REQUESTED

Mr. Lowell Aughenbaugh
President
Ortek, Inc.
7601 West 47th Street
McCook, Illinois 60525

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILD000646786

Dear Mr. Aughenbaugh:

On December 9, 14 and 21, 2011 and January 30, 2012, a representative of the U.S. Environmental Protection Agency (EPA) inspected Ortek, Inc. (hereinafter "Ortek" or "you") located in McCook, Illinois. The purpose of the inspection was to evaluate Ortek's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations regarding the generation, treatment and storage of hazardous waste, including used oil. We have enclosed a copy of the inspection report and checklists for your reference.

Based on information provided by Ortek personnel, a review of records, a follow-up request for information dated September 12, 2012, and physical observations made by the inspector at the time of the investigation, EPA has determined that Ortek is in violation of hazardous waste management requirements of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR). Specifically, EPA finds that Ortek failed to meet the requirements of a used oil processor, and is in violation of the following regulations:

1. In order to operate as a used oil processor, owners or operators must have a contingency plan for the facility designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil or surface water. See 35 IAC § 739.152(b)(1)(A) [40 CFR § 279.52(b)(1)(i)]. However, if the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan, the owner or operator need only amend that plan to incorporate used oil management provisions that are sufficient to comply with the requirements of a 35 IAC § 739.152(b). See 35 IAC § 739.152(b)(2)(B) [40 CFR § 279.52(b)(2)(ii)].

At the time of inspection, Ortek presented a copy of their SPCC plan. However, the SPCC plan was not amended to comply with the provisions of a contingency plan contained in IAC § 739.152(b)(2) [40 CFR § 279.52(b)(2)], nor was there a separate contingency plan available. Ortek, therefore, failed to meet the general facility standards of a used oil processor and is in violation of the abovementioned requirement.

2. In order to operate as a used oil processor, containers used to store or process used oil must be equipped with a secondary containment system which has at a minimum, dikes, berms or retaining walls as well as a floor that must cover the entire area within the dike, berm or retaining wall. See 35 IAC § 739.154(c)(1)(A) [40 CFR § 279.54(c)(1)]. It is also required that the entire containment system, including walls and floor, must be sufficiently impervious to used oil to prevent any used oil released from the containment system from migrating out the system to the soil, groundwater or surface water. See 35 IAC § 739.154(c)(2) [40 CFR § 279.54(c)(2)].

At the time of inspection, two 5-gallon pails and one 55-gallon drum of used oil near the off-loading pump near the 500 series tanks were not in secondary containment. Additionally, numerous totes with used oil near Tanks 100 and 101 sat on a concrete pad without secondary containment. Ortek, therefore, failed to comply with used oil management standards and is in violation of the abovementioned requirements.

3. In order to operate as a used oil processor, existing aboveground tanks must have a secondary containment system which has at a minimum, dikes, berms, or retaining walls and a floor that must cover the entire area within the dike, berm, or retaining wall except areas where existing portions of the tank meet the ground. See 35 IAC § 739.154(d)(1)(A) [40 CFR § 279.54(d)(1)]. It is also required that the entire containment system, including walls and floor, must be sufficiently impervious to used oil to prevent any used oil released into the containment system from migrating out the system to the soil, groundwater, or surface water. See 35 IAC § 739.154(d)(2) [40 CFR § 279.54(d)(2)].

At the time of inspection, Tanks 1-10, 100, 101, and 120-146 were not in secondary containment sufficiently impervious to prevent used oil from reaching soil. Additionally, an open-top tank covered with a tarp and plywood near the train tracks along the southern border of the facility contained used oil and was not in secondary containment. Ortek, therefore, failed to comply with used oil management standards and is in violation of the abovementioned requirements.

4. In order to operate as a used oil processor, containers and aboveground tanks used to store used oil at processing facilities must be labeled or marked clearly with the words "Used Oil." See 35 IAC § 739.154(f)(1) [40 CFR § 279.54(f)(1)].

At the time of inspection, a bucket catching drippings from Tank 101 was not labeled "Used Oil." Numerous buckets and one 55-gallon drum near the triple basin were not labeled "Used Oil." Various 5-gallon gallon buckets and one 55-gallon drum near the off-

loading area by Tanks 1-10 and 120-146 were not labeled "Used Oil." Two 5-gallon pails and one 55-gallon drum near the 500-series tanks were not labeled "Used Oil."

Additionally, oily debris observed in a truck bed was transferred to a nearby tote and 55-gallon drum over the course of the inspection. However, the tote and 55-gallon drum were not labeled "Used Oil." Ortek, therefore, failed to comply with used oil management standards and is in violation of the abovementioned requirements.

5. To ensure that used oil is not a hazardous waste under the rebuttable presumption of 35 IAC § 739.110(b)(1)(B), the owner or operator of a used oil processing facility must determine whether the total halogen content of used oil managed at the facility is above or below 1,000 ppm. See 35 IAC § 739.153(a) [40 CFR § 279.53(a)]. The owner or operator must make this determination by testing the used oil, or applying knowledge of the halogen content of the used oil in light of the materials or processes used. See 35 IAC §§ 739.153(b)(1) and (2) [40 CFR §§ 279.53(b)(1) and (2)].

At the time of inspection, Ortek presented their "Waste Analysis Plan," which contains a "Material Profile Sheet" that must be completed for all incoming used oil streams. Part J of the "Material Profile Sheet" mentions the rebuttable presumption for used oil, but it does not request a total halogen determination for the used oil or request a basis for knowledge of the used oil's halogen content. Part J also does not provide a location where total halogens may be recorded, nor is there a location elsewhere on the sheet. Total Halogens are not mentioned elsewhere on the "Material Profile Sheet."

Additionally, Part C of the "Material Profile Sheet" requests general information of the process that generated the used oil, but does not request any information or documentation about the process or its materials used that could lead to an accurate determination of the used oil's halogen content, e.g., the chemical composition of the virgin oil, whether used oil from the same process had been previously analyzed and where to find such information, a certification from the generator that the total halogen content of the used oil is below 1,000 ppm, or if the used oil had been mixed with other waste streams on the generator's site.

Information requested on the "Material Profile Sheet" does not allow Ortek to properly apply knowledge of the halogen content of the used oil in light of the materials or processes used, nor is it adequate to rebut the presumption of used oil mixture with halogenated hazardous waste listed in Subpart D of 35 IAC § 721 [Subpart D of 40 CFR Part 261]. Ortek, therefore, is in violation of the abovementioned requirements.

6. In order to operate as a used oil processor, owners or operators must ensure that used oil managed at the facility is not a hazardous waste by determining whether the total halogen content is above or below 1,000 ppm. If the used oil contains greater than or equal to 1,000 ppm total halogens, it is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste. The owner or operator may rebut this

presumption by demonstrating that the used oil does not contain hazardous waste. See 35 IAC §§ 739.153(a) and (c) [40 CFR §§ 279.53(a) and (c)].

Test results performed by Ortek on several watery oil streams indicate concentrations of total halogens over 1,000 ppm. On October 5, 2011, a "Daily Received Log Used Oils" sheet indicates that a 3,500 gallon shipment from International Titanium Powder had a chlorine concentration of 7,650 ppm (Ticket # 96760). On October 12, 2011, another "Daily Received Log Used Oils" sheet indicated three shipments also had chlorine concentrations over 1,000 ppm:

- Ticket # 96817 - 2900 gallons from Switch Craft with 3,899 ppm chlorine
- Ticket # 96819 - 4800 gallons from Laser Technology with 3,288 ppm chlorine
- Ticket # 96821 - 850 gallons from HazChem with 1,935 ppm chlorine

All shipments above were placed in Tank 101. At the time of inspection, no information was available to rebut the presumption that the above materials were not mixed with halogenated hazardous wastes. In response to an information request on November 12, 2012, Ortek could provide EPA no further information on these shipments. Ortek could not demonstrate the used oil was not mixed with halogenated hazardous waste and is therefore in violation of the abovementioned requirement.

7. In order to operate as a used oil processor, owners or operators must develop and follow a written used oil analysis plan describing the procedures that will be used to comply with the analysis requirements of the rebuttable presumption for used oil and, if applicable, on-specification used oil fuel. See 35 IAC § 739.155(a) and (b) [40 CFR § 279.55(a) and (b)]. When sample analyses are used to make the determination of used oil as on-specification fuel, the analysis plan must describe the method by which representative samples will be obtained, the location of the sampling and its frequency, and the methods used to analyze used oil for the parameters specified in 35 IAC § 739.172 [40 CFR § 279.72]. See 35 IAC §§ 739.155(b)(2)(A)-(D) [40 CFR §§ 279.55(b)(2)(i)-(iv)].

On November 12, 2012, EPA received Ortek's most recent "Waste Analysis Plan." As outlined in Violation 5 above, the "Material Profile Sheet" in the "Waste Analysis Plan" is not adequate to rebut the presumption of used oil mixture with halogenated hazardous waste because the sheet does not request total halogen content or related knowledge. Additionally the section "Outgoing On-Spec Used Oil Analysis Plan" does not describe the method by which representative samples will be obtained, the frequency of sampling, or the analytical method and location by which used oil will be tested to meet the parameters of IAC § 739.172 [40 CFR § 279.72]. Descriptions in the "Waste Analysis Plan" are not suitable to comply with the analysis requirements above. Ortek, therefore, is in violation of this requirement.

8. In order to operate as a used oil processor, the facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden

release of used oil to air, soil, or surface water which could threaten human health or the environment. See 35 IAC § 739.152(a)(1) [40 CFR § 279.52(a)(1)].

At the time of inspection, oil-stained soils were observed near Tanks 120-146. Oil-stained soils were also observed near the triple-basin area and lift-station, and in between Tanks 9 and 133. Ortek, therefore, is in violation of the abovementioned requirement for the general facility standards of used oil processors.

9. No person may conduct any hazardous waste storage, hazardous waste treatment, or hazardous waste disposal without a RCRA permit. See IAC § 703.121(a)(1). Accordingly, owners or operators of hazardous waste management units, including tanks which store hazardous waste, must have permits during the active life of the unit. See IAC § 703.121(b) [40 CFR § 270.1(c)].

At the time of inspection, eight hazardous waste manifests indicated the off-site shipment of D001, D008, and D039 hazardous waste from Ortek Tanks 120, 122, and 146. The manifests were:

- 001528685 GBF on November 1, 2011
- 001528686 GBF on November 2, 2011
- 001528724 GBF on November 7, 2011
- 001528725 GBF on November 8, 2011
- 001528726 GBF on November 9, 2011
- 001528727 GBF on November 10, 2011
- 001528729 GBF on November 11, 2011
- 001528730 GBF on November 14, 2011

These manifests displayed the generator of the hazardous waste to be RS Used Oil Services, Inc. (RS) albeit with the site address of Ortek. When asked about the hazardous waste shipments during the inspection, Ortek personnel indicated the material originally came to Ortek in April and May of 2011 through RS, a used oil transporter which routinely brings used oil to Ortek tanks. Ortek personnel pointed out five incoming shipments in April and May 2011 on an RS Account Statement for Ortek dated 7/7/2011. These five shipments (April 1 and May 2, 6, 9, and 17, 2011) were identified by Ortek personnel as the material that was later shipped off Ortek's site on the hazardous waste manifests above.

In response to an information request on October 10, 2012, RS Used Oil Services provided EPA analytical tests performed by Precision Petroleum Labs, Inc. on September 9, 2011 for material in Ortek Tanks 120, 122, 132, 146 and 500. In addition to demonstrating that the material in Tanks 120, 122 and 146 were characteristic for D001, D008 and D039 hazardous wastes, the results also showed that material in Ortek Tank 132 was characteristic for D001, D007, D008 and D039 hazardous waste. Ortek, therefore was storing hazardous waste in Tanks 120, 122, 132, and 146 without a hazardous waste permit and is in violation of the abovementioned requirements

Additionally, and as outlined in Violation 6 above, Ortek failed to provide information to rebut the presumption of used oil mixture with halogenated hazardous waste for four incoming used oil shipments in October, 2011. The four used oil streams had total halogen concentrations greater than 1,000 ppm and were initially placed in Tank 101. Ortek, therefore, was also storing hazardous waste in Tank 101 without a hazardous waste permit and is in violation of the abovementioned requirements.

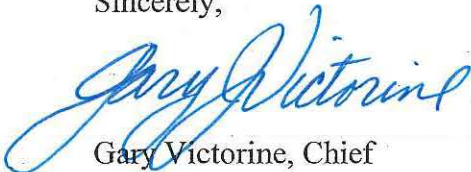
10. Owners or operators of facilities that use tank systems for storing or treating hazardous wastes must follow the regulations of Subpart J of IAC § 725 [Subpart J of 40 CFR § 265].

As outlined in Violation 9 above, Ortek stored hazardous wastes in Tanks 120, 122 and 146 until such wastes were shipped off-site in November, 2011. Ortek also stored hazardous waste in Tank 132 and Tank 101. Ortek, therefore, was storing hazardous waste in Tanks 101, 120, 122, 132, and 146 and was required to meet the hazardous waste storage tank requirements in Subpart J of IAC § 725. Ortek failed to do so. Ortek, therefore, is in violation of the abovementioned requirement.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your written response to Brian Kennedy, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, or if you wish to confer with us regarding the issues stated above or to present any relevant information you believe we should consider, please contact Mr. Kennedy, of my staff, at (312) 353-4383.

Sincerely,



Gary Victorine, Chief
RCRA Branch

Enclosure
Inspection Report and Checklists

cc: Anna VanOrden, IEPA – Des Plaines District Office (anna.vanorden@illinois.gov)



U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Blvd
Chicago, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Ortek Inc.

EPA ID NUMBER: ILD000646786

ADDRESS: 7601 West 47th Street
Mc Cook, Illinois 60525

DATES OF INSPECTION: December 9, 14, and 21, 2011 and
January 30, 2012

EPA INSPECTOR: Michael Beedle

PREPARED BY:


Michael Beedle

2/3/12
Date

ACCEPTED BY:


Paul Little, Chief, CS2

2-3-12
Date

Purpose of Inspection

This inspection was an evaluation of the Ortek Inc.'s compliance with hazardous waste and used oil regulations found at Illinois Administrative Code and the Code of Federal Regulations. The inspection was an EPA lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Inspector:

Michael Beedle, Environmental Scientist, EPA

Representatives of Ortek:

Robert Kolar, Project Manager

Laurie Witter, Office Manager

Introduction

This inspection was conducted over four separate days on December 9, 14, and 21, 2011 and January 30, 2012. I first arrived at the site at approximately 10:10 AM on December 9th. I met with Ms. Witter and Mr. Kolar introduced myself; presented my inspector credentials and business card; and described the purpose and the process of the inspection. Mr. Kolar provided a description of the site and led the tour. Ms. Witter and Mr. Kolar provided records for review. Ortek has approximately seven employees. Ms. Witter and Mr. Kolar typically work to approximately 4:30 PM.

I provided a Small Business Resources information sheet to Mr. Kolar on December 21st. Mr. Kolar and Ms. Witter indicated that the owner of the facility is currently in prison and that they were doing the best they could in consideration of the circumstances. (See: <http://www.mysuburbanlife.com/lagrange/features/x1328933671/Man-barricaded-in-home-in-McCook-Lyons-area>)

Site Description

Ortek has notified as used oil refiner and marketer. The site takes in used oil, waste antifreeze, and non-hazardous wastewater. The site use to distill the used oil to manufacture gas oil. The site's stills have not operated since January 2010 or January 2009. Ortek took in crank case oil from Future Environmental and distilled it for them. The site formerly made lube oil many years ago.

Ortek takes in wastewater that has a small amount of oils on it. The site consolidates the wastewaters. When enough oil is on the top of the water, the oil removed. The site discharges the separated water to the sewer per a pretreatment permit. The site does not treat the water with chemicals. It only separates oil from the water. It operates as a Centralized Wastewater Treatment facility.

The site reclaims antifreeze. The site filters antifreeze and removes any oil from the top of it. The site then adds ingredients to antifreeze to meet specification. The site sends antifreeze samples offsite to make sure it meets the final product specifications.

The site packages and sells the antifreeze and reclaimed oil to Mazan Khatib of New World Sales who sold the material under the Super XXX product brand. Mr. Kolar said there is another company out there using the Ortek Super XXX label that is putting out bad material. He said there is an investigation of who is using their label.

Mr. Kolar checks the used oil for chlorine and PCBs using an Oxford XRF. He said the sample is taken as the tanker is offloaded. He said the used oil is placed into a tank and is segregated until the analytical is completed. He said they have rejected loads with high chlorine.

Mr. Kolar said the material received is mostly water. He said the oil floats to the top of the water. He said the water is sent to the wastewater treatment plant. He said the water is not treated with any chemicals. The water is discharged to the sewer. Only gravity separation is used for the treatment. I asked about the solids settling out of the oil and wastewater. He said the solids are still in the tanks and have not been removed for a number of years.

Mr. Kolar said chemicals are added to oil to help the separation from water. He said caustic, alum and polymers are added. He said the oil is sold or returned to their customers. The site main customers were identified as: Future Environmental, North Branch Environmental, Turn-Key, Haz Chem, and Illinois Recovery Group.

Mr. Kolar said the solids/sludge from their oil/antifreeze/wastewater processing are in the tanks. He said there are solids generated in the filtration of antifreeze in socks. Mr. Kolar and Ms. Witter said the last time the solids were removed was 4 or 5 years ago by Best Environmental.

Site Tour

We toured the site observing the lab; used oil tanks; stills; the triple basin; oil and antifreeze packaging; and the wastewater treatment plant. I took photographs of the various waste operations and waste storage/accumulation areas during the inspection. See the photographs in Attachment A.

We started the tour in the lab. The site runs flash point on material they are sending offsite. Mr. Kolar said the site rejects gasoline. The lab has a GS/MS that is currently down. The site sends samples out for such analysis as necessary. The site use pH paper to determine the pH of a material. The site has centrifuge and will do DSW on a occasion. DSW is a centrifugal analysis to determine the amount of oil, water and solids in a sample of material. The site also does solvent extraction of some material in the lab. The site uses acetone, and toluene for the extractions. The acetone and toluene are placed into a lab oil bucket. The lab oil is returned to the oil tanks.

We observed tank 101. It was labeled used oil. It did not have secondary containment (photos 1-5). There were a tray and a 5 gallon bucket outside of tank 101 to catch oil drippings (photos 3-5). There was a small amount of oil in each. Neither were labeled or marked used oil.

We went to the boiler and observed tanks (200 series) for finished products and additives. The boiler and finished oil products operations had not been running for a couple of years.

I observed tanks 1, 2, and 3. The tanks were labeled used oil. These tanks were in secondary containment. Mr. Kolar said that water is taken off the oil and it is dehydrated in these tanks. I observed the triple basin where debris/dirt is separated off oil. I took pictures of the basin (photos 6, and 15-18). The basin is pumped to tank 101. Tanks 1-6 take water off oil and the water is sent to the wastewater treatment plant. There was oily debris on top of the basin's grates and several 5-gallon buckets (photos 15 and 17). The buckets were not labeled used oil. In the offloading area near tanks 1-10 and tanks 120-146 there were numerous 5-gallon buckets (photo 7) and a 55 gallon drums holding used oil. These containers were not labeled or marked used oil.

I observed a truck being loaded during the tour. Illinois Recovery Group (IRG) out of Franklin Park and Morris was picking up oil. The driver, Zach Petry, said the truck was going to the Morris facility to a storage tank. He said the material is sold to asphalt companies as fuel.

We walked on the south side of the 1-10 and 120-146 tanks. The tanks do not have secondary containment. The soil near these tanks appeared to be oil stained (photos 8 and 9). Tanks 1-10 are on a concrete pads but do not have secondary containment walls.

I observed a monitoring well during the tour (photo 10). Mr. Kolar said that there were 8-10 monitoring wells onsite. I took pictures of the catch basins, lift station, and triple basin south of the 1-10 and 120-146 tanks (photos 11-26). The catch basins are used capture liquid run off from the processing areas (photos 11- 14, 16, 24 and 25).

The lift stations (photos 19 and 20) are used to send material to the wastewater treatment plant. I observed that oil was being released from the triple basin, catch basin and lift station area onto the adjacent soil (photos 11-14, and 16). I observed sludge/solids in the bed of a truck (photos 21, 24 and 26) in this area. The tarp over the sludge was torn and not covering the material. Mr. Kolar said the sludge was from loading and offloading at the triple basin.

There is an area south of these tanks where oil was formally loaded/off-loaded into rail cars (photos 22-23). The secondary containment under this area had oil in it. I observed an old tank that had a worn tarp and plywood on it (27-29). Mr. Kolar said the tank was approximately $\frac{3}{4}$ full of sludge. Photo 29 is under the plywood and tarp. Sludge, debris and liquid can be seen in the photo.

Tank 100 has flexible piping from it to the triple basin area (photo 30). Outside of tank 100, I observed oil sludge on the ground (photo 31). The tank was labeled used oil but did not have secondary containment (photo 32). The level indicator on tank 100 showed that the tank was approximately half full (photo 33).

I observed a tanker truck arriving at Ortek from Turn-Key. I talked to the driver, Brandon Miller. He showed me non-hazardous wastewater manifest he was carrying. The material on the manifest was rejected by Klean Water in Indiana and was rerouted to Ortek.

We went into a building called the grease shack (photos 34-41). Mr. Kolar indicated that the building had not been used for a number of years. There were numerous abandoned drums, containers, and six lead acid batteries in the building. Some of the material was hazardous material in 5-gallon cans (approximately 12 cans). This material included chlorobenzene, 2-propanol, pyranol (PCB) and a can marked poisonous (catechol) (photos 37-39). I discussed with Mr. Kolar the dangers of abandoned chemicals and that it is common for such material to start leaking. I also mentioned waste requirements associated with spent batteries.

I next observed the offloading pumps near the 500 series tanks (photos 42 and 43). There were two 5-gallon pails without lids and a 55-gallon drum in this area. The pails were not labeled or marked used oil and contained oil. One had a large filter in it. The 55 gallon drum was closed and labeled used oil. The containers were not in secondary containment.

I observed tank 400 (photos 44 and 45). It is 250,000 gallon tank that is used to store used oil from Future. This is the oil that would be refined into gas oil if that operation resumes. Tank 400 is labeled used oil and has secondary containment. It is mostly full.

We went to wastewater treatment plant. Near this area there was spill a couple years ago from a heavy rain event. Mr. Kolar indicated that Future helped clean up the spill and that oil eating microbes were placed in the area. I did not observe any residual oil staining in the area.

Mr. Kolar said the wastewater treatment consists of API oil water separator. He said there was no chemical additive used to treat the water. He said that only physical separation occurs. He said that the oil recovered from it is pumped to tank 323. He said the solids from the treatment are still in the tanks. He said the solids had not been removed for a couple of years.

I observed the thermal oxidizer, three stills, hydrotreating treatment units and associated tanks that are used for refining the used oils. These units were not operating.

Record Review

After the tour on December 9, I met with Ms. Witter and Mr. Kolar. We further discussed site operations. It was reported that Future uses tanks 7, 8 and 400 for oil storage. In tanks 7 and 8, Future drops and picks up used oil on a routine basis. Tank 400 used oil has been in storage for a couple years. Mr. Kolar said all waters go into the triple basin which in turns goes into tank 101. Tank 101's water is taken off and sent to the WWTP. Oil is moved to another tank where more water may be removed. If the oil is dry enough it is sold to a customer. Ortek will sell it to Illinois Recovery or Future. Ms. Witter said that Ortek does not get analytical results with water shipments.

Because of participants' schedules, we discussed performing the record review on another day. I described the documents I would like to review which included: a site diagram, used oil manifests, antifreeze shipments, analytical data on the material received and shipped, the analysis plan and the biennial report. The inspection ended at 2:00 PM on December 9, 2011. Mr. Kolar emailed me a site diagram after the first day of inspection was completed (Attachment B).

December 14

I returned to Ortek on December 14, 2011 at 1:30 PM to review documents. I met with Mr. Kolar and Ms. Witter. Mr. Kolar further described the antifreeze process to me. He said the antifreeze is coming in a similar manner as oily waste. It does not come into the wastewater system. He said the site processes the antifreeze to make new antifreeze. He said they separate the oil and glycol. The antifreeze is filtered, the pH is adjusted, and an additive package including surfactants and more glycol are added. He said Mazen Khatib (New World Sales) is the person that Ortek bottles up the material under the Super XXX brand. Ms. Witter said that Mr. Khatib is not part of Voyager Petroleum. Voyager Petroleum comes up when a web search of Super XXX is done. Mr. Kolar said the antifreeze sits for month for separation. He said the material is packaged approximately twice a month depending on demand. It is package into 1-gallon jugs.

I asked about the storage of Future's oil. Mr. Kolar said the Future's oil is not processed. I asked if any of the Future material was stored more than 35 days. He said in tank 400 it is. As of November 2010 there was approximately 230,000 gallons of used oil in tank 400 per scale records. Tank 400 is a 250,000 gallon tank. Future's contacts are Steve Lempa, owner; and Jim Tietz, Vice President; Future's phone number is 708-479-6890. The crank case oil was vacuum distilled to make gas oil. It was shipped offsite and further processed by another company to make gasoline.

Ortek brings in antifreeze and wastewater on manifests and used oil on bills of lading. I reviewed some of Future's incoming and outgoing shipping documents for 2011. I did not see used oil rebuttable presumption information for the shipments.

I reviewed shipping documents for a company named RS Used Oil Services. In this folder there were several incoming and outgoing shipping documents, invoices and communications. There were eight hazardous waste manifests that had the generator's name and mailing address as RS Used Oil Services, Inc., 25903 S. Ridgeland Avenue, Monee, Illinois 60449. The Generator's ID was ILR000167478. The generator's site address was Ortek's, 7601, W. 47th Street, McCook, IL 60525. Ziron Environmental Services was the transporter on the manifests. The designated receiving facility was Green Castle WDF Facility in Indiana. The U.S. DOT description was RQ, UN 1992, Waste Flammable Liquids, N.O.S., 3 (6.1), PGII (RQ-D001)(Petroleum Distillates, Tetrachloroethylene). The waste codes on the manifests were D001 (ignitable), D008 (lead), and D039 (tetrachloroethylene).

Ms. Witter provided copies of two manifests, one land disposal restriction notification, a spreadsheet with shipment information and an email communication related to RS hazardous waste shipments (Attachment C). The material was removed from tanks 146, 122, and 120 per the spreadsheet and email communications. An account statement showing shipments to Ortek from RS was provided to me. Ms. Witter said the six shipments highlighted from RS on the account statement were the material sent offsite on manifests. The received material highlighted was date ranged from 4/14/11 to 5/17/11. The hazardous waste manifests were shipped from 11/1/11 to 11/14/11. A total of 41,312 gallons were shipped offsite as hazardous waste. Ms.

Witter said the material did not meet specs and was sent offsite. Ms. Witter provided documents related to RS shipment to Ortek on 4/14/11 (Attachment D).

The generator's ID on the manifests is not the same as Ortek's. Searching this ID comes up with the RS as the generator at Ortek's address in McCook. The notification says the generator is a Large Quantity Generator. See Ortek's notification information in Attachment E and RS' notification information in Attachment F.

Mr. Kolar provided a copy of the Ortek's Used Oil Management Waste Analysis Plan (Attachment G). Mr. Kolar said that manifests received are entered into spreadsheet approximately every other day. He said analytical data is recorded on a daily basis in log sheets. I reviewed the manifest of the wastewater that was rejected from Klean Water in Griffin Indiana that Turn-Key rerouted to Ortek. This was the shipment I observed during the site tour on December 9. There was nothing unusual marked on the manifest. The inspection on December 14 ended at approximately 4:15 PM. I arranged to continue the inspection on another day to be able complete the inspection checklist.

December 21, 2011

I arrived at approximately 2:00 PM. I met with Mr. Kolar and Ms. Witter to complete the used oil inspection checklist and to review the analytical records kept by Ortek. Mr. Kolar provided a copy of the Spill Prevention, Control and Counter Measures Plan (Attachment H); documents associated a July 24, 2010 spill and response (Attachment I); Ortek's Illinois Nonhazardous Special Waste Annual Report (Attachment J); and a copies of Certificate of Analysis for samples identified as glycol; oil 503; and WO 4, 5, 6, 101 (Attachment K). The glycol analysis had an arsenic results of 25.58 ppm. The WO 4, 5, 6, 101 sample had chromium levels at 179 ppm.

Mr. Kolar indicated that he uses approximately 1-gallon of acetone every two months; and 1-gallon of toluene every six months for solvent extraction of oil in the lab. He said he runs chlorine analytical on everything they bring in except antifreeze product. The Oxford XRF was not running and was shipped offsite for repair. He said it worked for a few days then went down again. Mr. Kolar reported that the site is still receiving some waters.

Mr. Kolar thought the site was a centralized waste treater. Mr. Kolar said that since Jamie Snyder left that there was no compliance person onsite. They reported that Mr. Snyder and Mr. Aughenbaugh did most of the environmental compliance work for the site. Mr. Kolar said he was hired to run the vacuum distillation oil refining units and he was not hired for environmental compliance.

Ms. Witter said the site is not really taking in material at this time because of the Oxford being down. She said the site will bring in water and oil when the Oxford is fixed. Mr. Kolar and Ms. Witter said that three or four years ago, solids were taken out of the site. They thought Best Environmental is the contractor that came in and took out the solids.

It was reported that Future uses Tanks 7 and 8 for a few days to a week at most for storage of used oil and that tank 400 was storing Future's used oil for more than 35 days.

I reviewed some of the chlorine analytical data. I was somewhat confused by the system Ortek used. The Oxford printout was in percentages. Mr. Kolar wrote down the percentages as parts per million (ppm) in a log book on occasion. For example, I observed an Oxford printout of 0.149% and the recorded value of 0.149 ppm was recorded in the log. I mentioned to Mr. Kolar that it is my understanding that a reading of 0.149% is equivalent to 1,490 ppm. Mr. Kolar and I discussed this information.

I partially completed an used oil inspection checklist during the December 21 inspection (Attachment L). I was not able to fully evaluate information needed to complete the rebuttable presumption of mixing of used oil with hazardous waste. I mentioned that Ortek should have the generators rebut the presumption for each shipment and a profile with analytical data should be completed for each waste stream. The inspection on December 21 ended at 4:30 PM. I made arrangements to come back when the Oxford was working and to review the reporting of results.

January 30, 2012 Record Review

I arranged to observe the analytical device that Ortek uses for chlorine analysis. I arrived at the site at 10:30AM. I met with Mr. Kolar and Ms. Witter. We went to the lab and observed the Oxford Lab X3000 XRF. The device measures chlorine and sulfur content. Mr. Kolar demonstrated how the device is used on a sample received. Mr. Kolar keeps a log of chlorine results and pH by scale ticket number for each shipment received. The document is entitled "*Daily Receiving Log Used Oils*" (Daily Log). The Oxford analytical printout is stapled to the log. The printout reports percentage of chlorine. Mr. Kolar mostly recorded the percentage on the log up to December 21, 2011 when we discussed the difference between percentage and parts per million. The log is kept in the laboratory.

I observed on the Daily Logs that for the days October 5, and October 12, 2011 that specific shipments received were above 1000 ppm chlorine. On 10/5, generator ITD, load 8, scale ticket 96760, the chlorine results were recorded as 0.7650 (7650 ppm). Ms. Witter provided a copy of this manifest associated with this ticket number. On 10/12 there were three shipments above 1000 ppm chlorine on the log and printouts. Scale ticket numbers 96817 and 96819 had analysis results of 0.6626% and 0.3288% respectively. Ms. Witter provided copies of these manifests for these two ticket numbers. See the Daily Logs and Manifests in Attachment M.

I observed numerous manifests for incoming shipments for January 2012. Most of the shipments were of wastewater. I observed samples that Ortek takes of each shipment. The sample jar is marked with the last three digits of the scale ticket number. I observed some samples of tank 101. It appeared to be half water and half oil. There were samples of oil/water transferred from tank 101 to tanks 126, 127, and 132 in the laboratory too. Mr. Kolar said the water is first taken off tank 101 and the oil is transferred to other tanks for further drying. According to Mr. Kolar this makes the drying easier and less chemicals are used for drying (water separation and removal).

I asked Mr. Kolar and Ms. Witter about the RS hazardous waste shipments. Mr. Kolar said the chlorine was too high in the oil. Ms. Witter said she told RS to pick up the material because Ortek could not use it. Ms. Witter said she did not know why it was hazardous waste.

I asked Mr. Kolar and Ms. Witter about the RS notifying as a large quantity generator and getting a EPA ID number for the Ortek address. Both said they did not know that RS had done so. Ms. Witter said that RS did not have a lease on any of Ortek's tanks.

Mr. Kolar provide a copy of a spreadsheet describing the current inventory: "*Ortek Storage Tanks Inventory*". Mr. Kolar stepped through the current inventory. I took notes on the document as we discussed it (Attachment N). Mr. Kolar did not know what was in 143 and 144 from memory. Ms. Witter called one of the tank operators to determine the contents. Tank 143 contents was distilled oil from when the distillation units were operating two years ago, other referred to as dried crank case oil. Tank 144 content was mostly dry oil with a little water in it from Haz Chem.

January 30, 2012 Tour

I briefly toured some of the concern areas identified during the December 9 tour. I took photos of some of the concerns. We went to the used oil container at the offloading area near tank 133. The container was a 275 gallon tote with the top cut off (photos 46-48). It was labeled used oil. Mr. Kolar said Ortek put down a secondary containment in the area. The asphalt was sloped and had side curbing (photo 48). I observed there was oil stained soil in between tanks 9 and 133 (photo 49).

I observed the truck that contained oil contaminated debris in its bed. Ortek had placed a new tarp and completely covered the waste after the 12/9/11 tour. Mr. Kolar said that Ortek started to place such solids in a drum and tote. The 55-gallon drums and the 1-cubic yard tote were not closed or labeled used oil. The containers were located at the railroad car offloading area (photos 51 and 52).

Ortek stores a number totes on a concrete pad. The pad does not have curbing or walls. The pad is in between tanks 100 and 101. The majority of the totes were labeled used oil. Mr. Kolar said the containers, for the most part, were empty. However there were at least three containers that were 1/4 to 1/3 full (photos 53-55).

We continued to the grease shack to view the 5-gallon cans. I told Mr. Kolar that the pyranol was tradename for PCBs. He was surprised and did not know why the site would have it. We viewed cans in the shack. The labeled cans had material in them. Some of the unlabeled cans did not. The can above the pyranol was rotated to be able read the label. It was butyl alcohol (photo 56). The can chlorobenzene can was light and may have been mostly empty.

One additional labeled can was discovered amongst the various excess equipment in the grease shack. The product description of the can could not be read but it did have a flammable liquid DOT label on it and material in it (photos 57-58).

We finished the tour by observing the offloading area near the 500 series tanks. The used oil container was closed, in good condition, and labeled but was not in secondary containment (photo 59).

Closing Conference

I summarized the secondary containment of tanks and containers; hazardous waste shipments; profile information; and rebuttable presumption issues and concerns identified during the inspection. The inspection concluded at approximately 12:50 PM on January 30, 2012.

Attachments

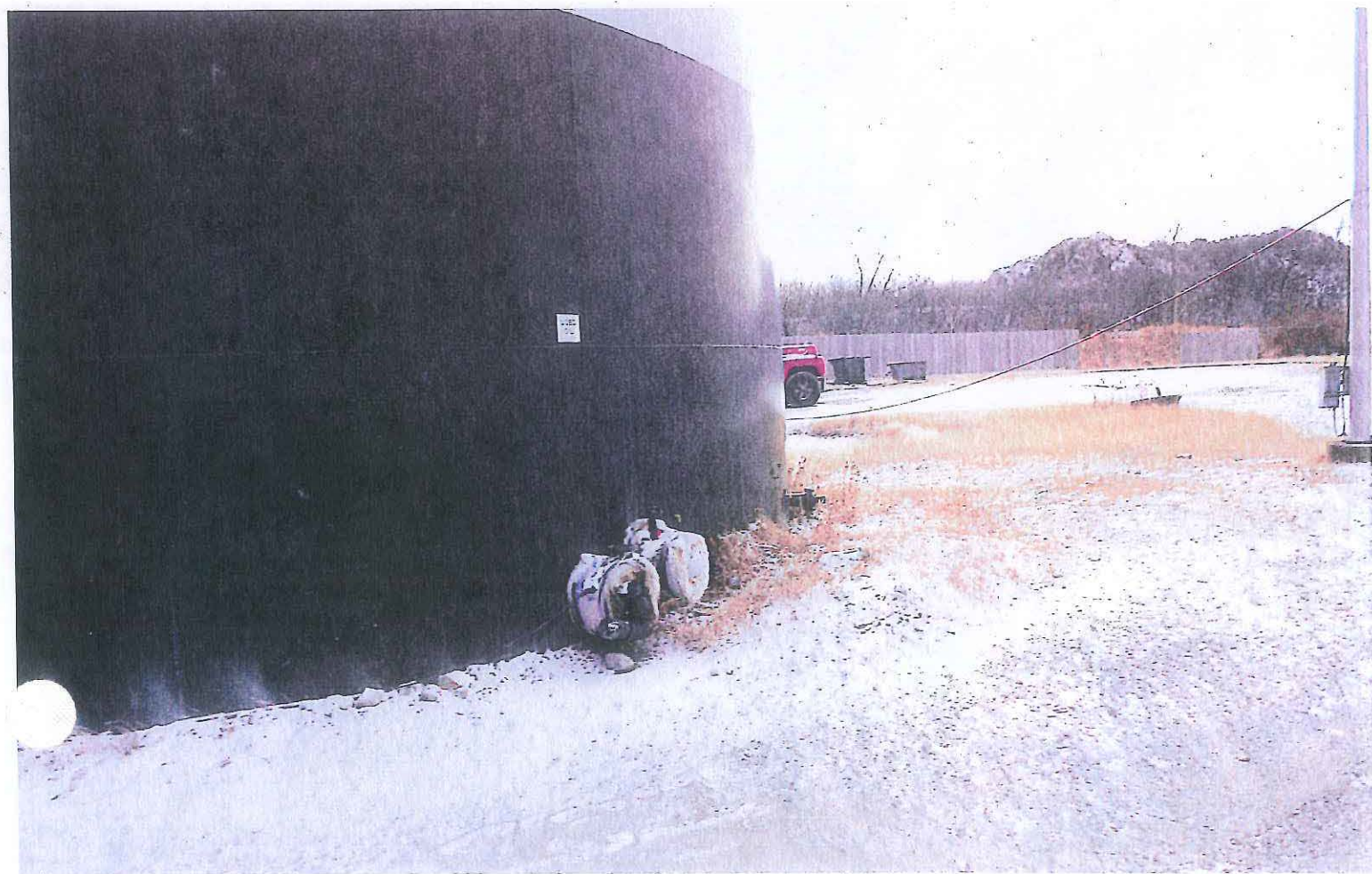
- A. Photographs
- B. Site Diagram
- C. RS Hazardous Waste Shipment Documents
- D. RS 4/14/11 Shipment Information
- E. Ortek's Notification
- F. RS Used Oil Services' Notification
- G. Used Oil Waste Analysis Plan
- H. SPCC Plan
- I. Release Information 7/24/10
- J. Special Waste Annual Report
- K. Analysis
- L. Checklist
- M. Daily Logs and Manifests
- N. Ortek Tanks Inventory

ATTACHMENT A

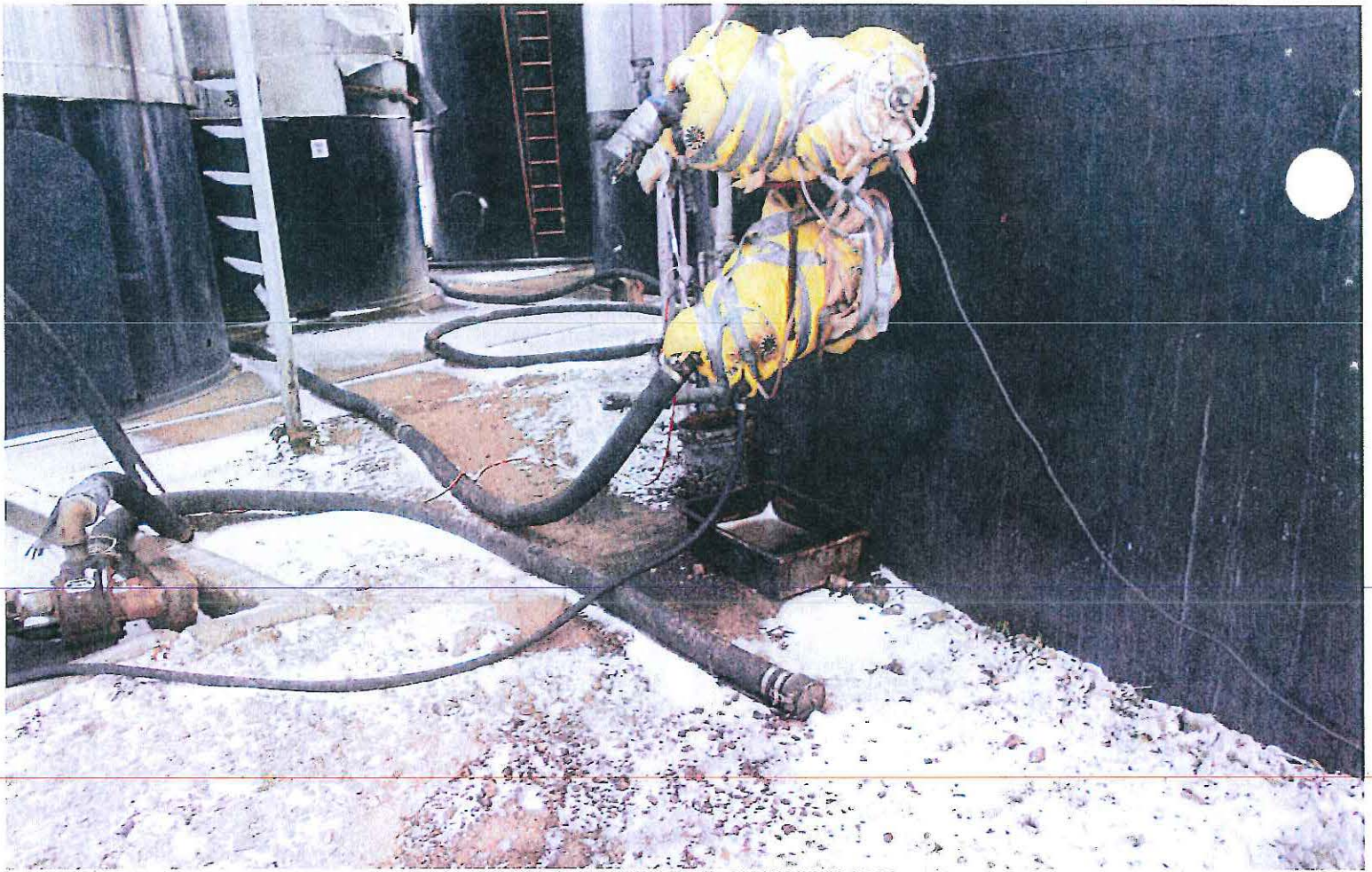
Photographs



Ortek Photo 01 by Mike Beedle, 2011/12/09 13:33:53



Ortek Photo 02 by Mike Beedle, 2011/12/09 13:35:28



Ortek Photo 03 by Mike Beedle, 2011/12/09 13:35:37



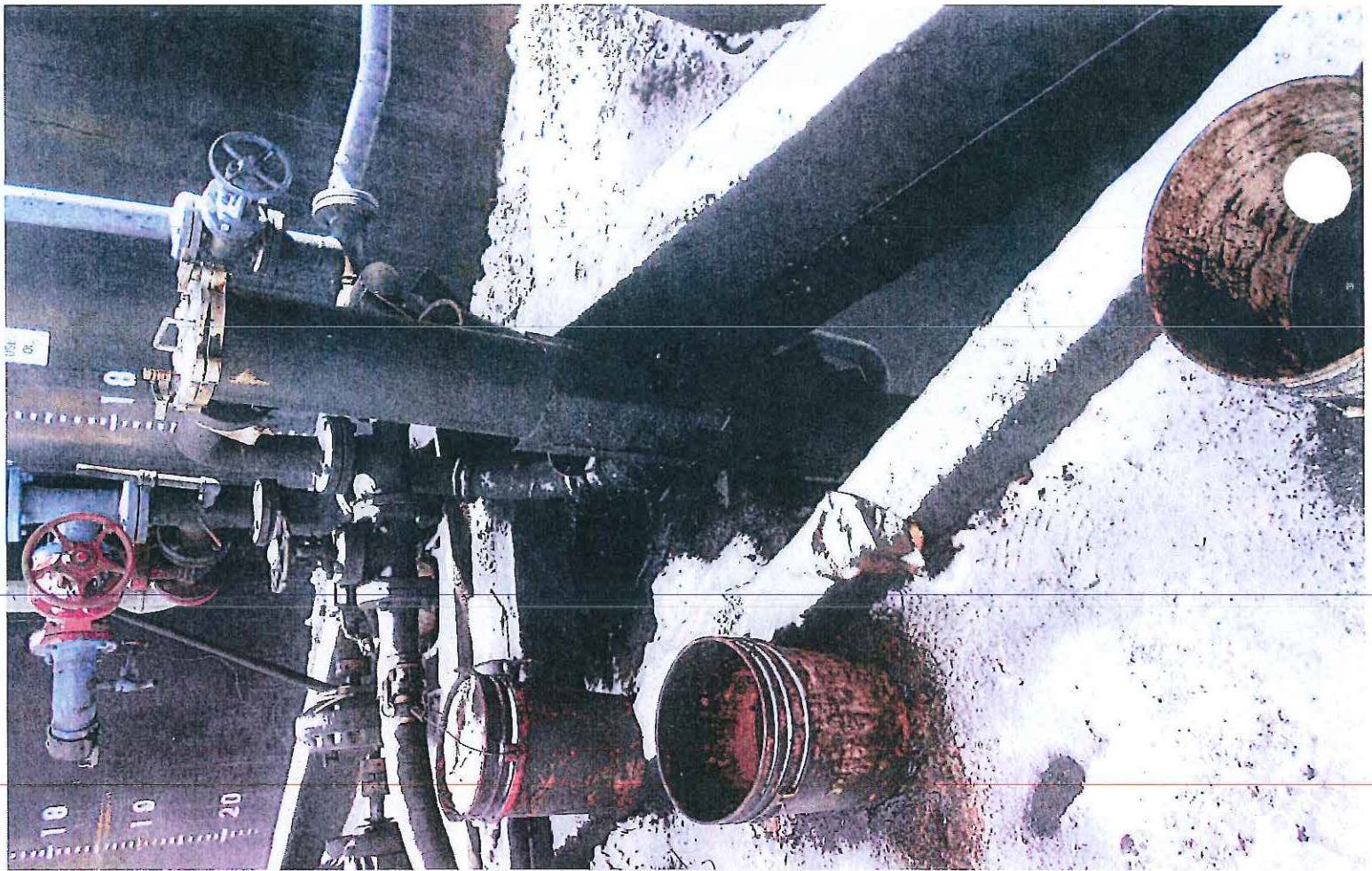
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Ortek Photo 05 by Mike Beedle, 2011/12/09 13:36:01



Ortek Photo 06 by Mike Beedle, 2011/12/09 13:38:29



Ortek Photo 07 by Mike Beedle, 2011/12/09 13:45:23



Ortek Photo 08 by Mike Beedle, 2011/12/09 13:49:13



Ortek Photo 09 by Mike Beedle, 2011/12/09 13:49:49



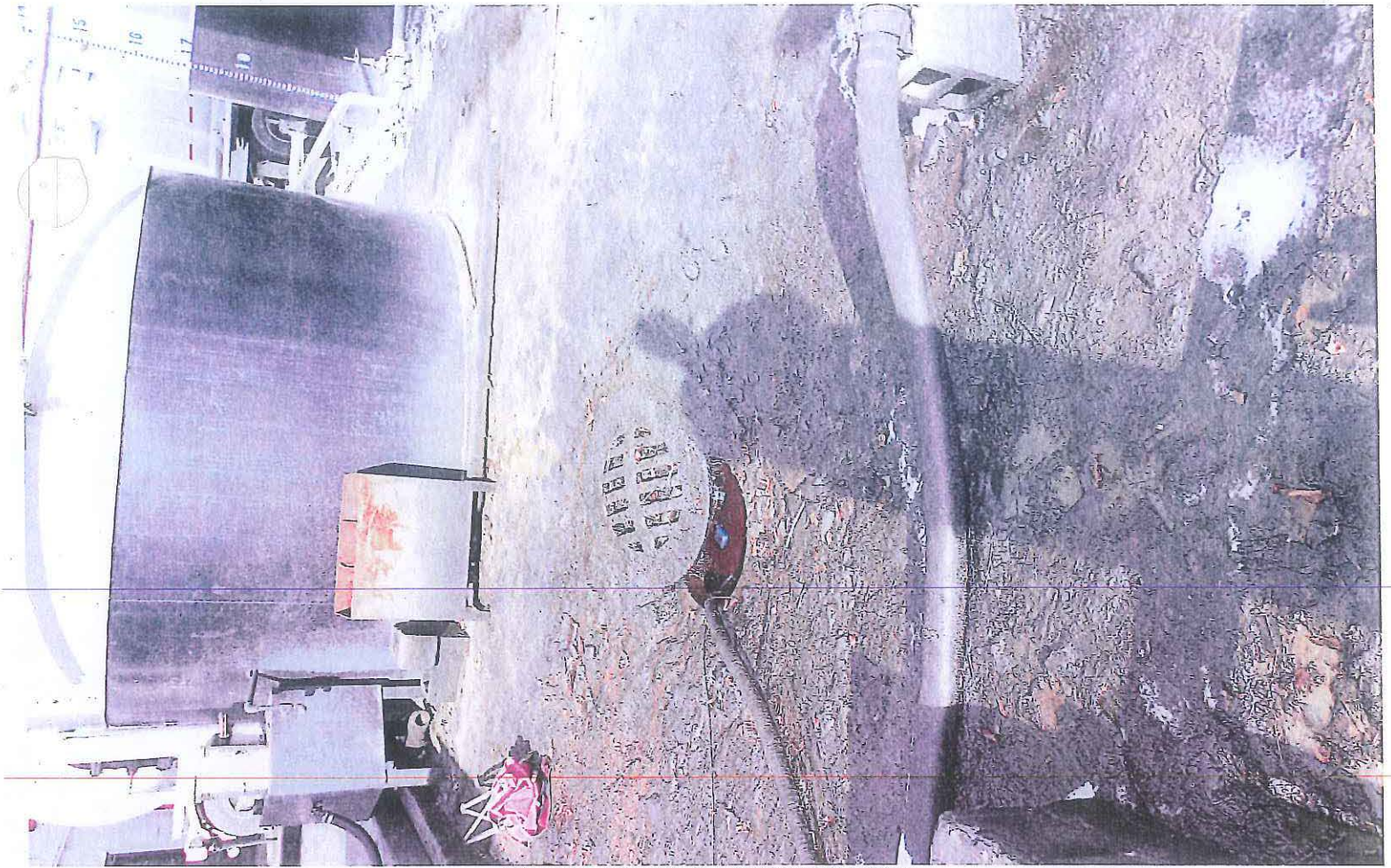
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Ortek Photo 11 by Mike Beedle, 2011/12/09 13:51:56



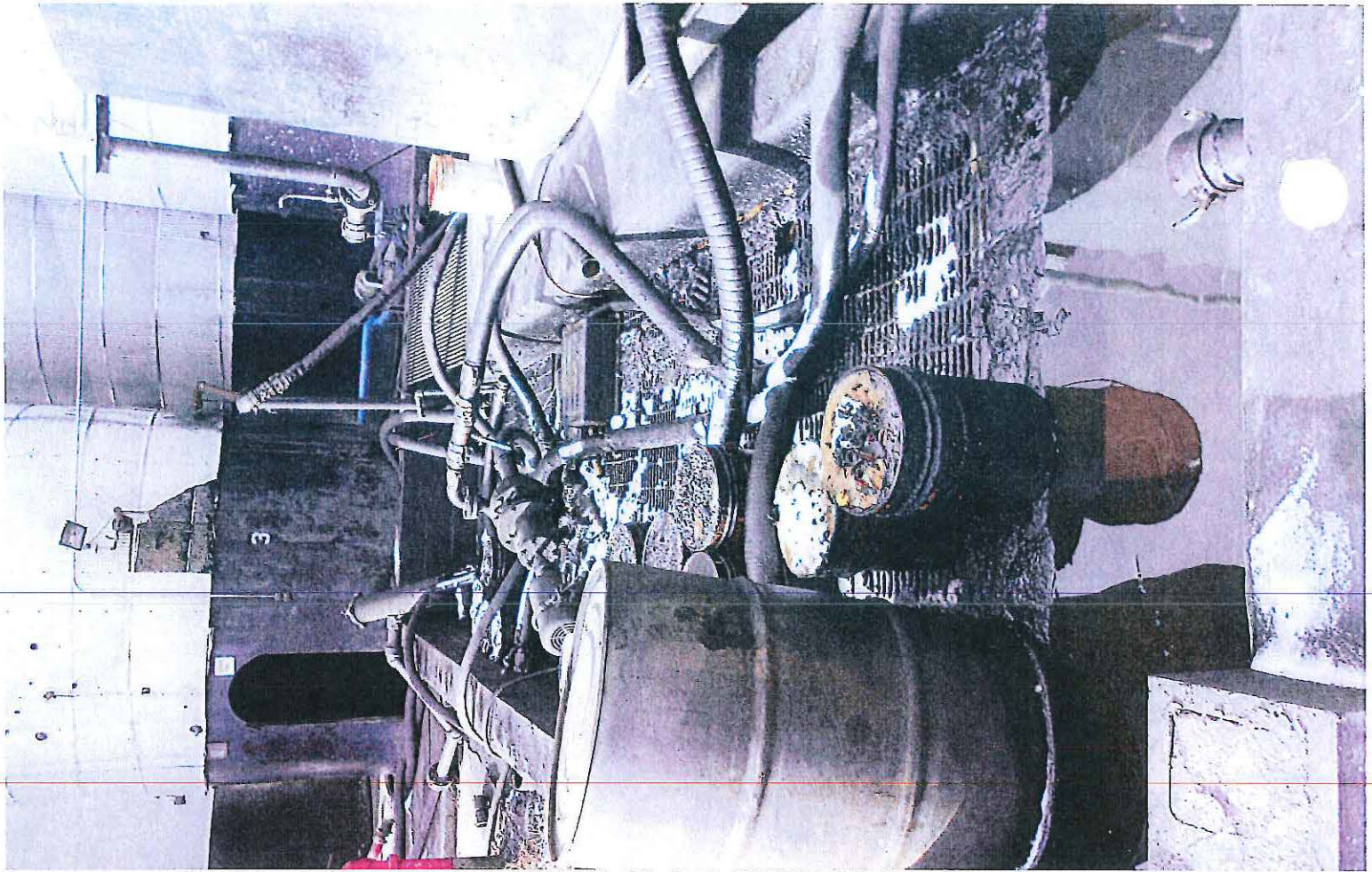
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Ortek Photo 13 by Mike Beedle, 2011/12/09 13:54:15



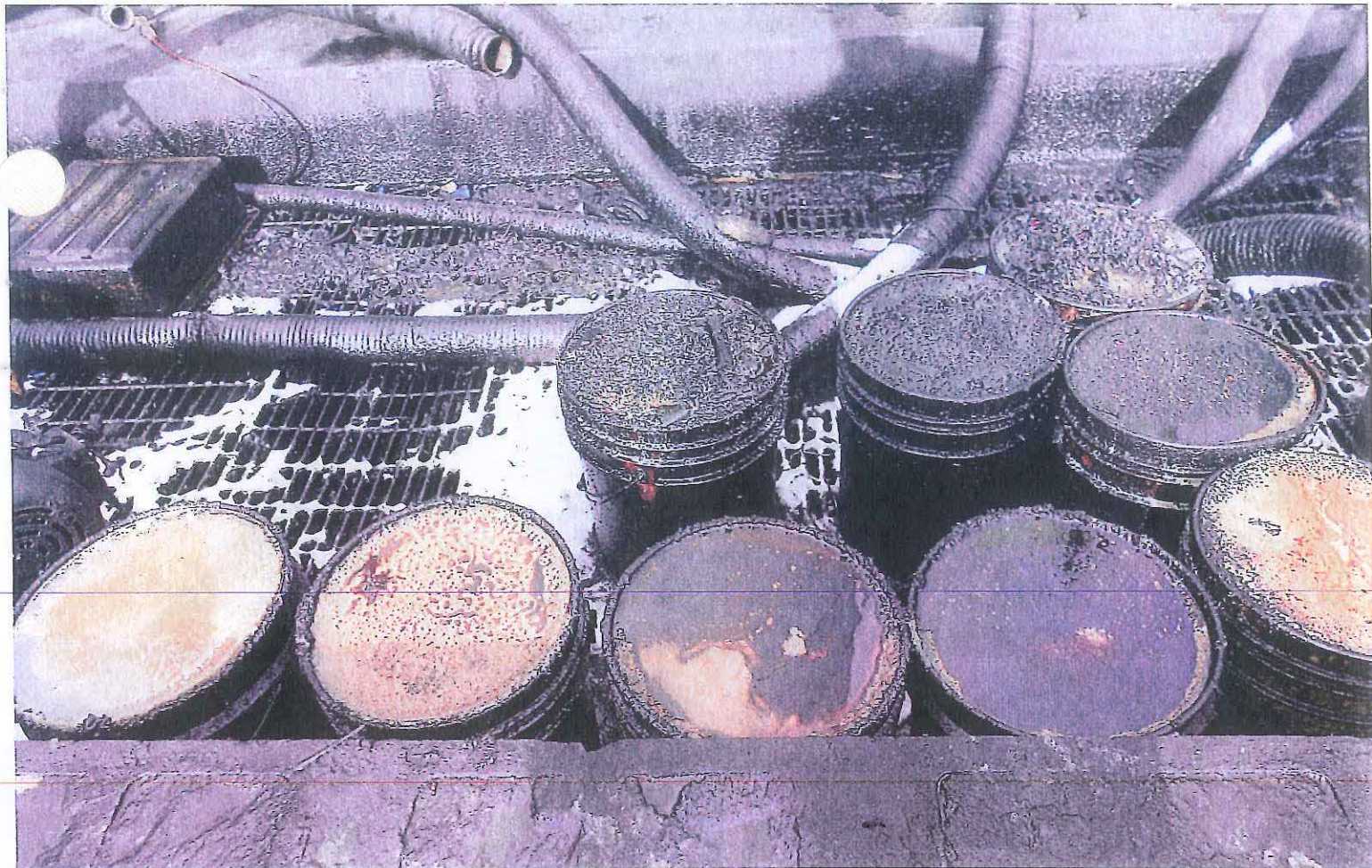
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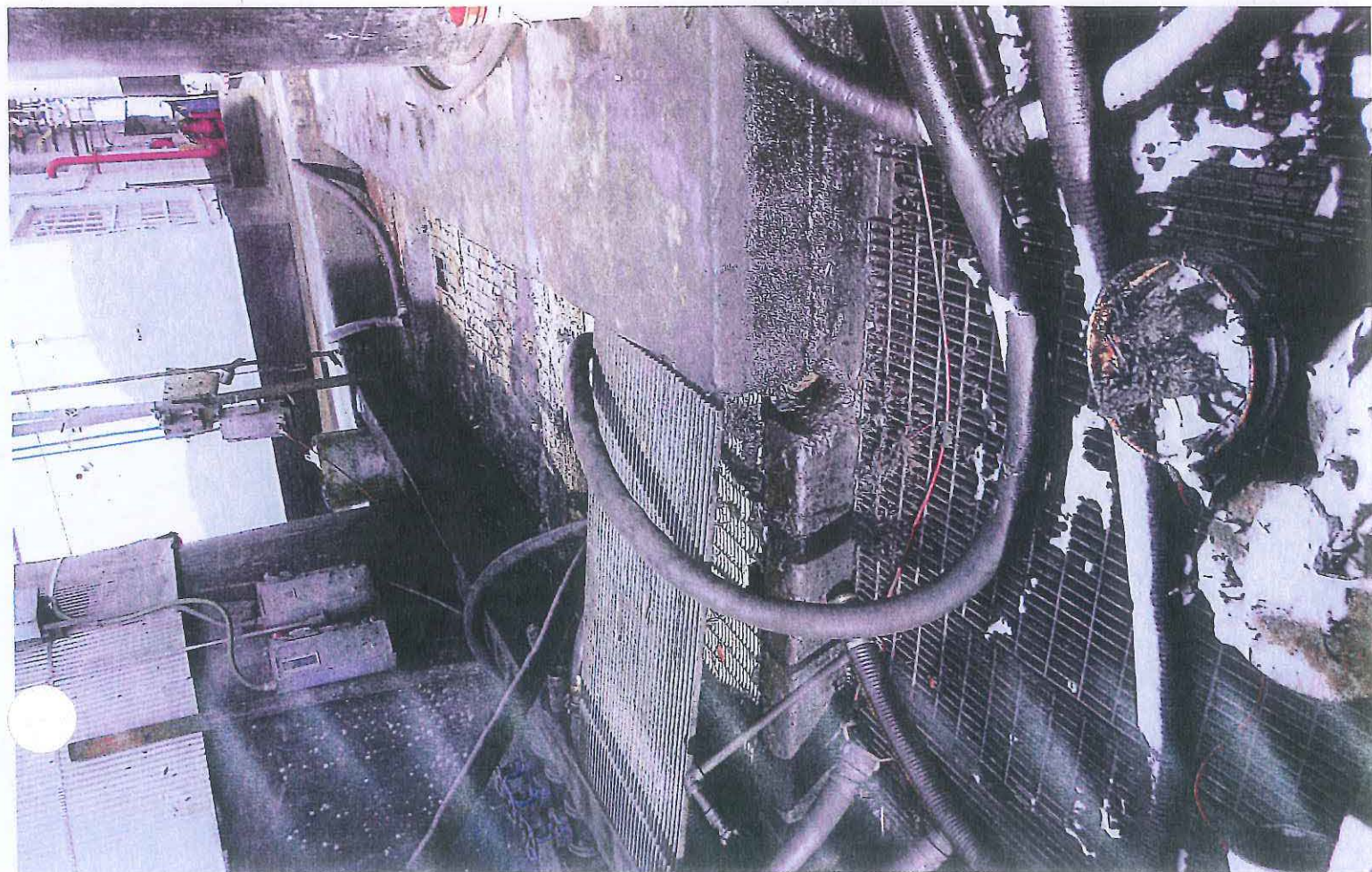
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Ortek Photo 16 by Mike Beedle, 2011/12/09 13:55:56



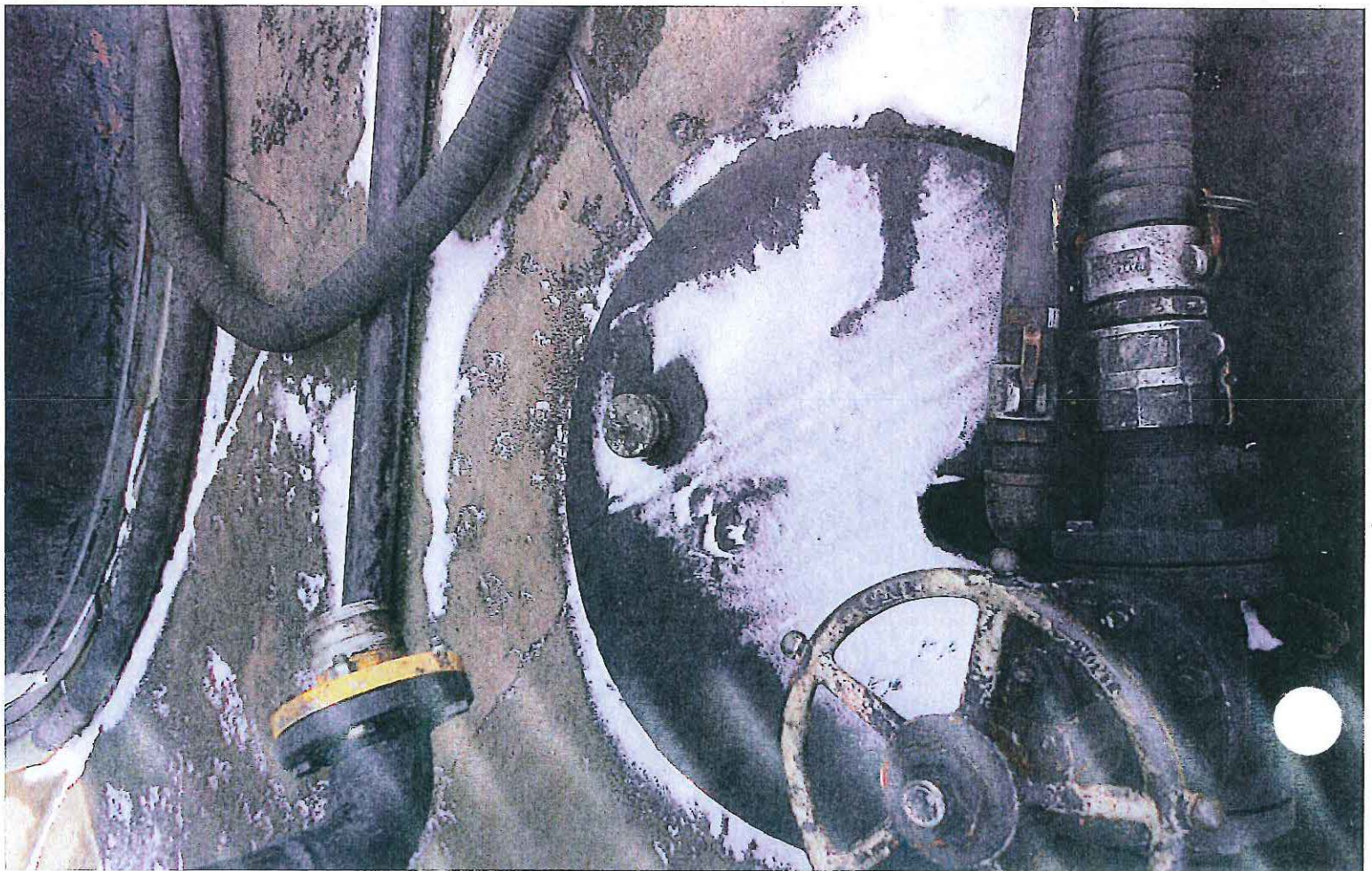
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Ortek Photo 18 by Mike Beedle, 2011/12/09 13:56:17



Ortek Photo 19 by Mike Beedle, 2011/12/09 13:56:22



Ortek Photo 20 by Mike Beedle, 2011/12/09 13:56:34



Ortek Photo 21 by Mike Beedle, 2011/12/09 13:57:00



Ortek Photo 22 by Mike Beedle, 2011/12/09 13:58:57



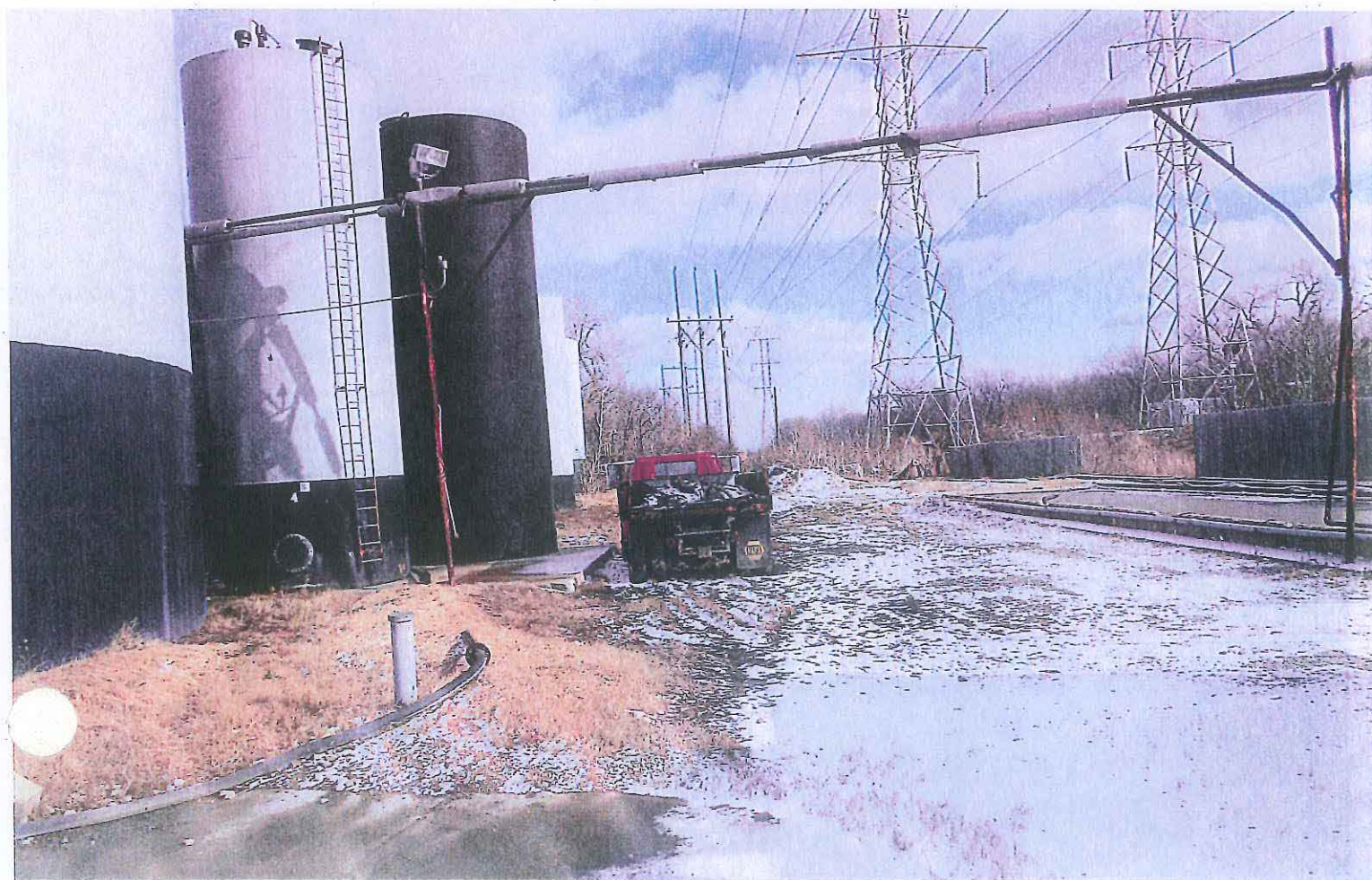
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Ortek Photo 24 by Mike Beedle, 2011/12/09 14:00:31



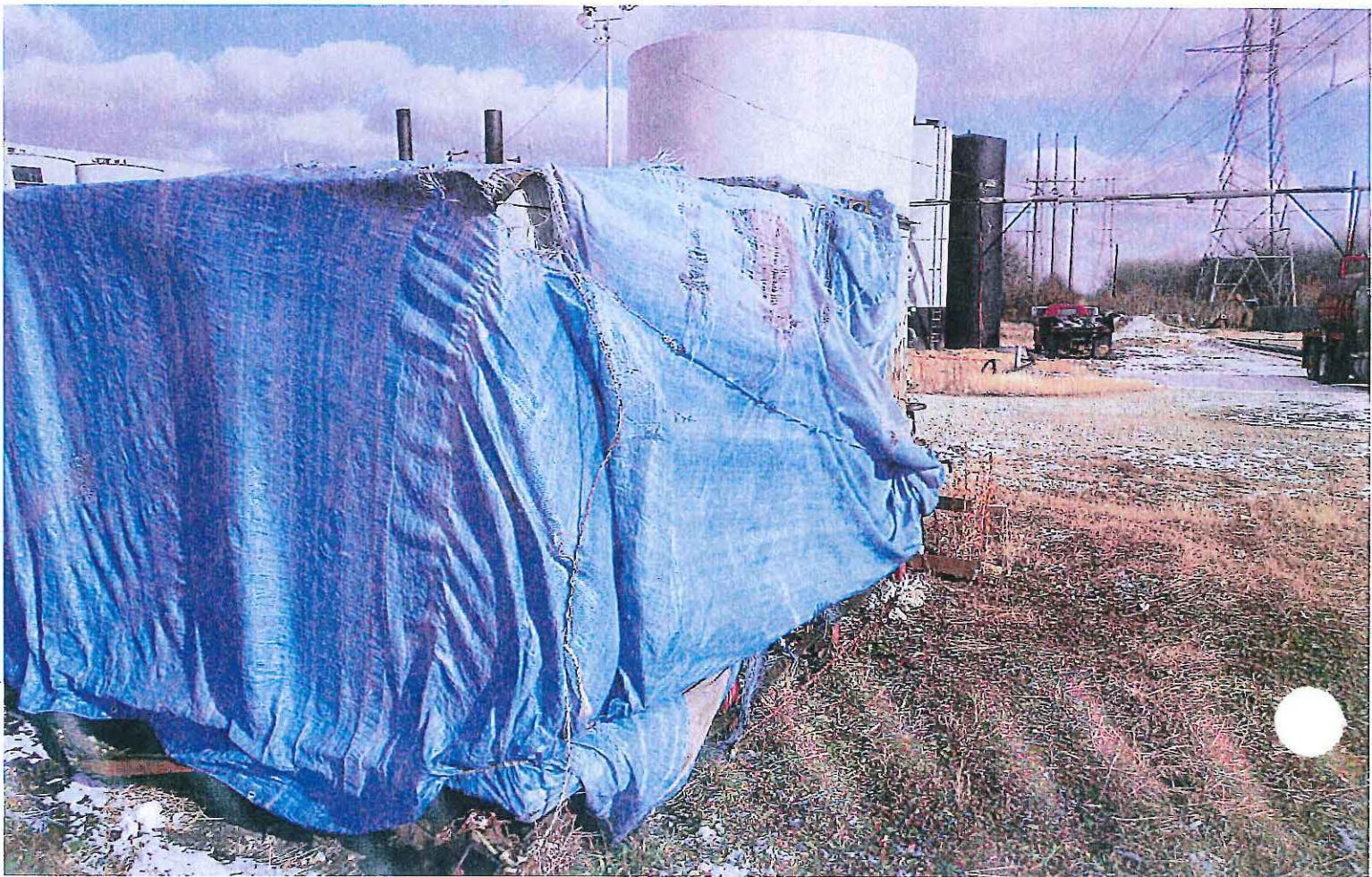
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Ortek Photo 26 by Mike Beedle, 2011/12/09 14:00:56



Ortek Photo 27 by Mike Beedle, 2011/12/09 14:03:38



Ortek Photo 28 by Mike Beedle, 2011/12/09 14:03:46



Ortek Photo 29 by Mike Beedle, 2011/12/09 14:03:57



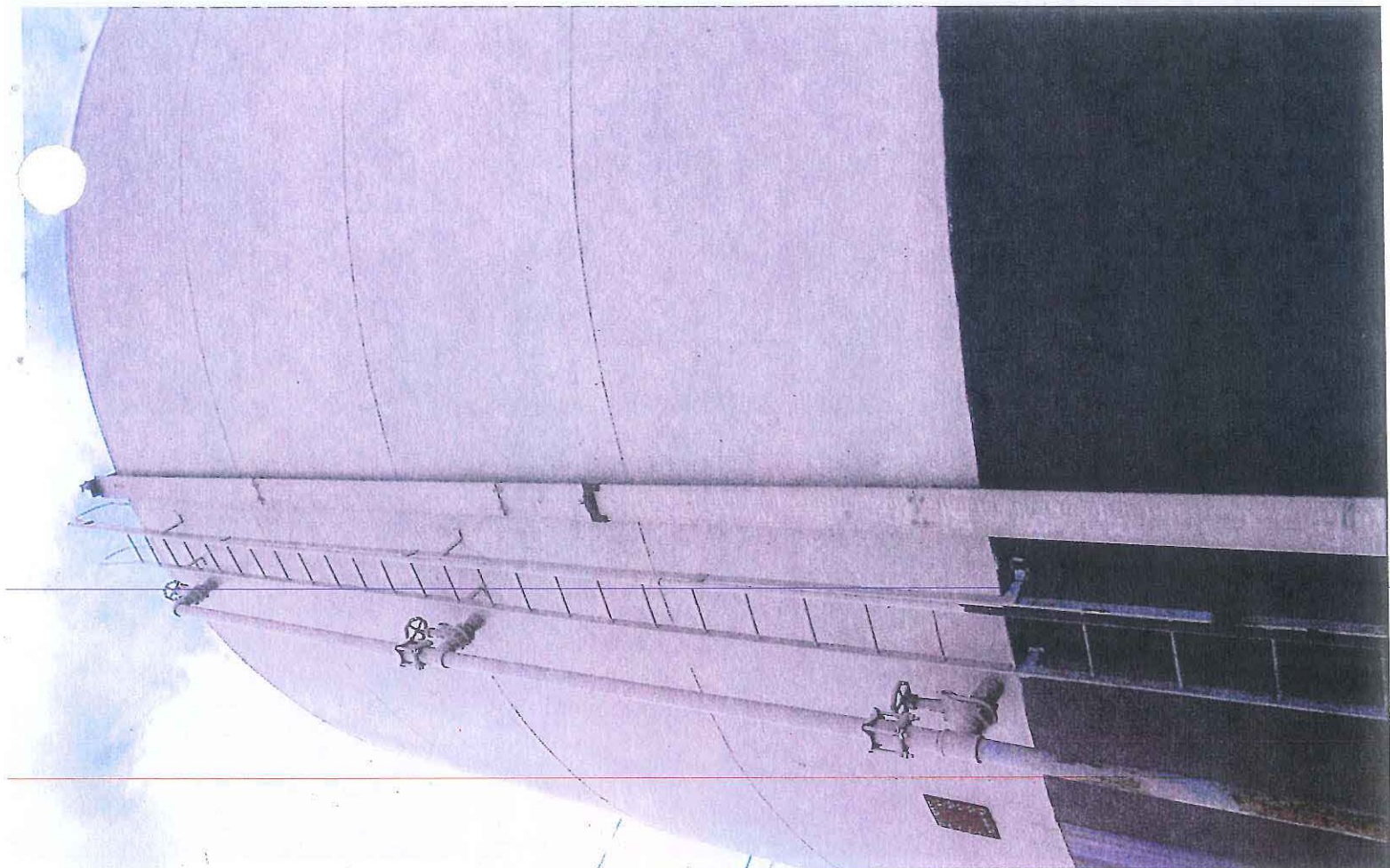
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Ortek Photo 31 by Mike Beedle, 2011/12/09 14:07:31



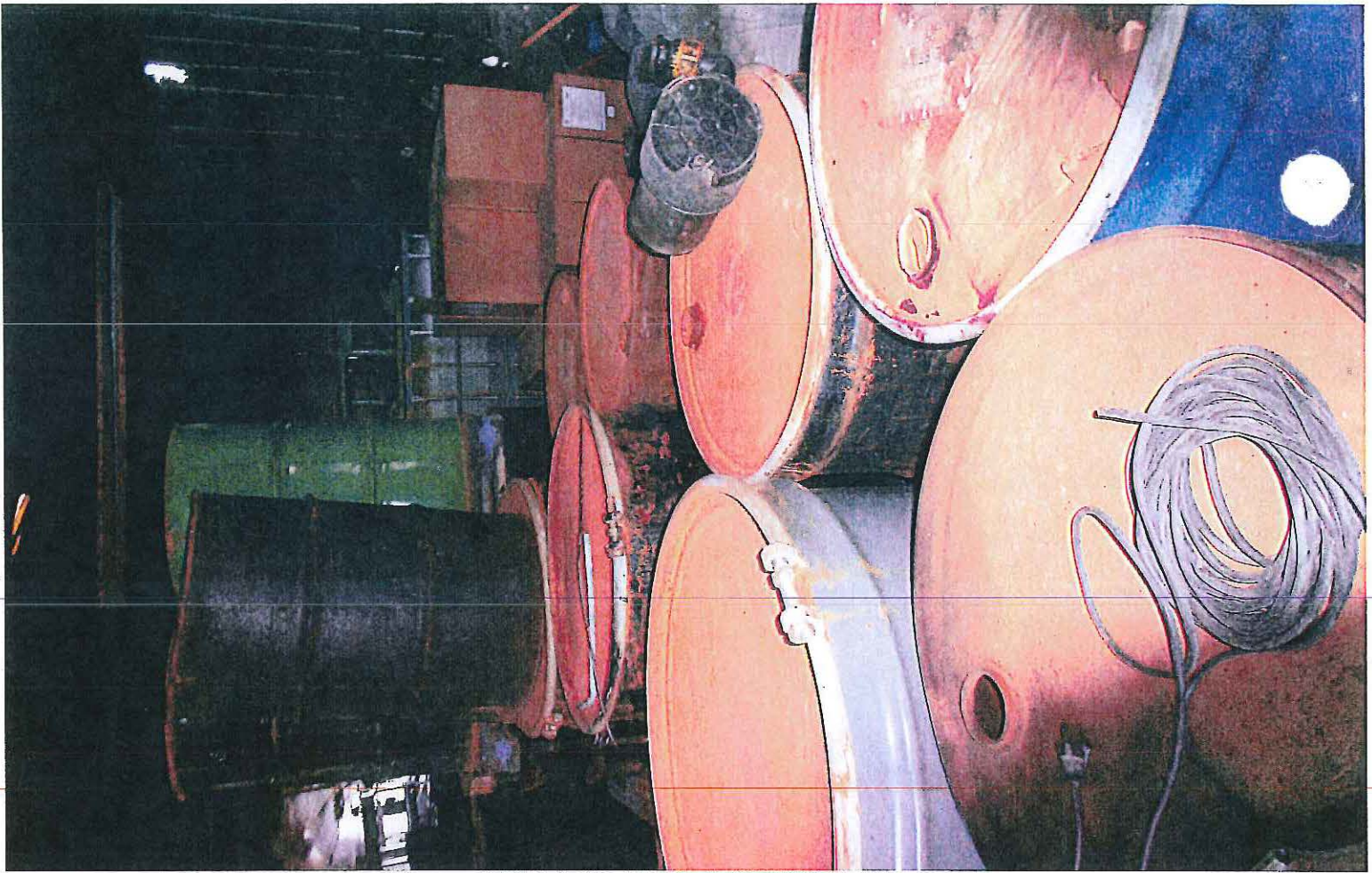
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Ortek Photo 33 by Mike Beedle, 2011/12/09 14:08:18



Ortek Photo 34 by Mike Beedle, 2011/12/09 14:16:39



Ortek Photo 35 by Mike Beedle, 2011/12/09 14:16:58



Ortek Photo 36 by Mike Beedle, 2011/12/09 14:17:43



Ortek Photo 37 by Mike Beedle, 2011/12/09 14:18:07



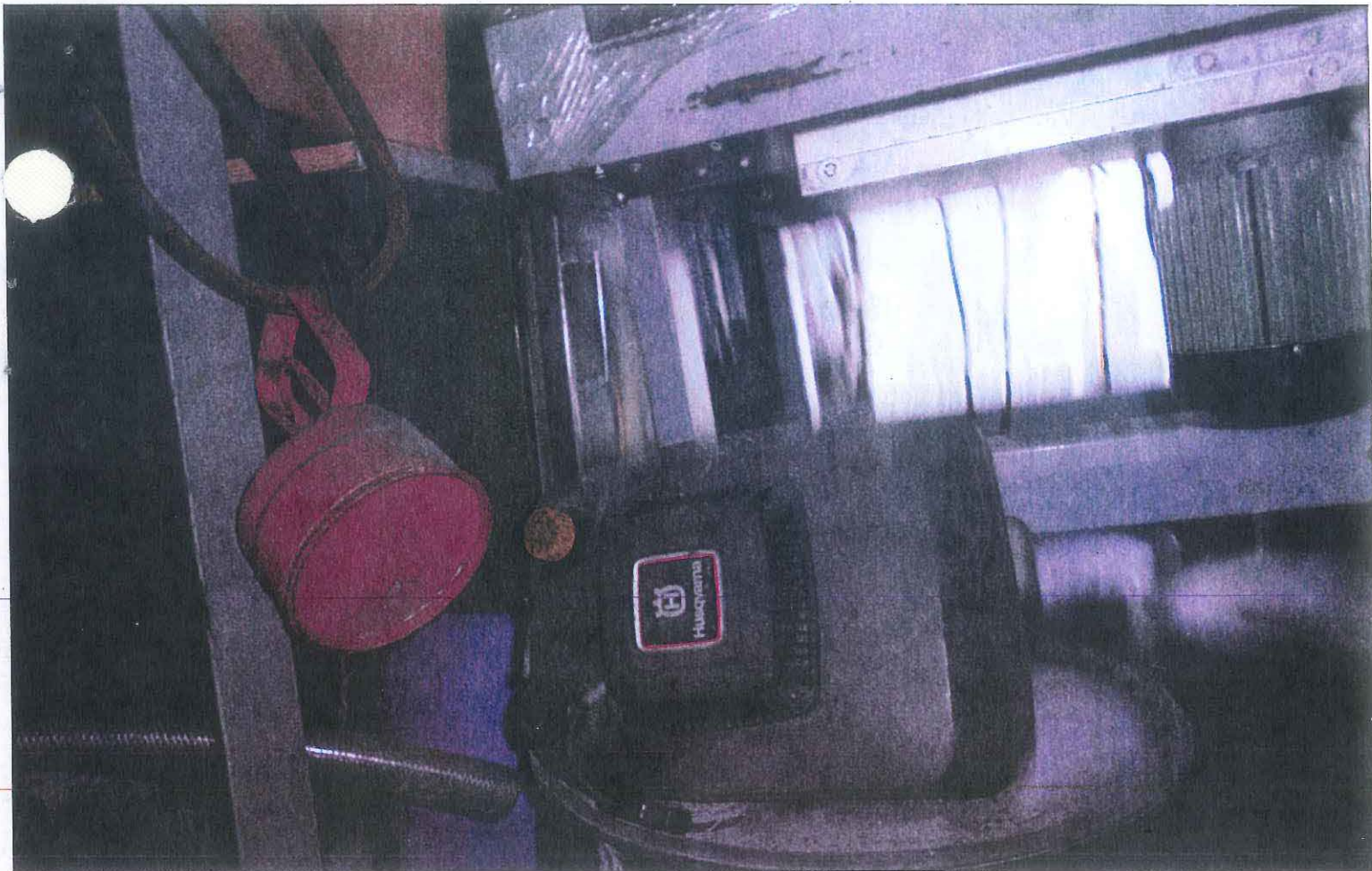
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Ortek Photo 39 by Mike Beedle, 2011/12/09 14:18:33



Ortek Photo 40 by Mike Beedle, 2011/12/09 14:19:26



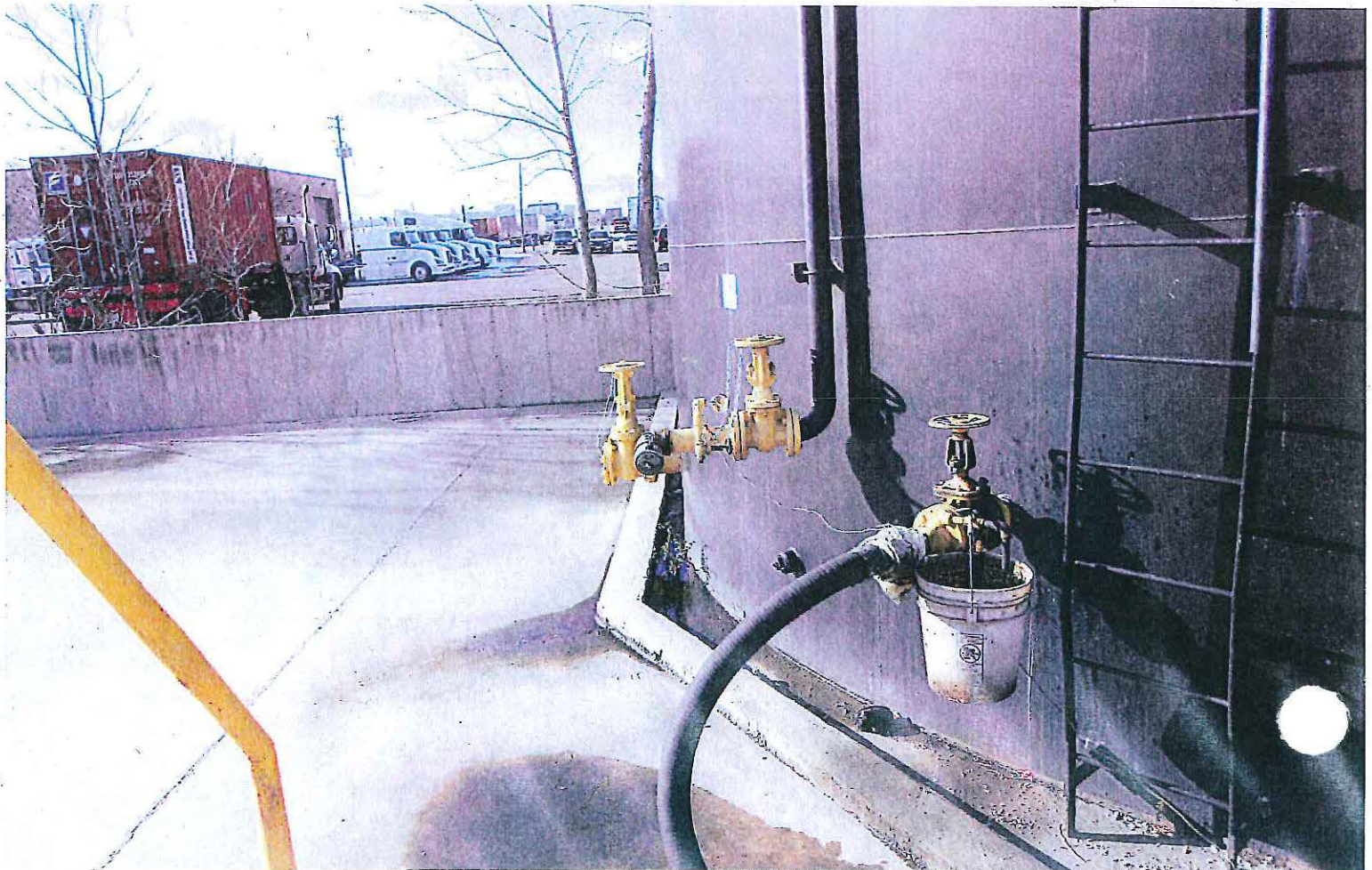
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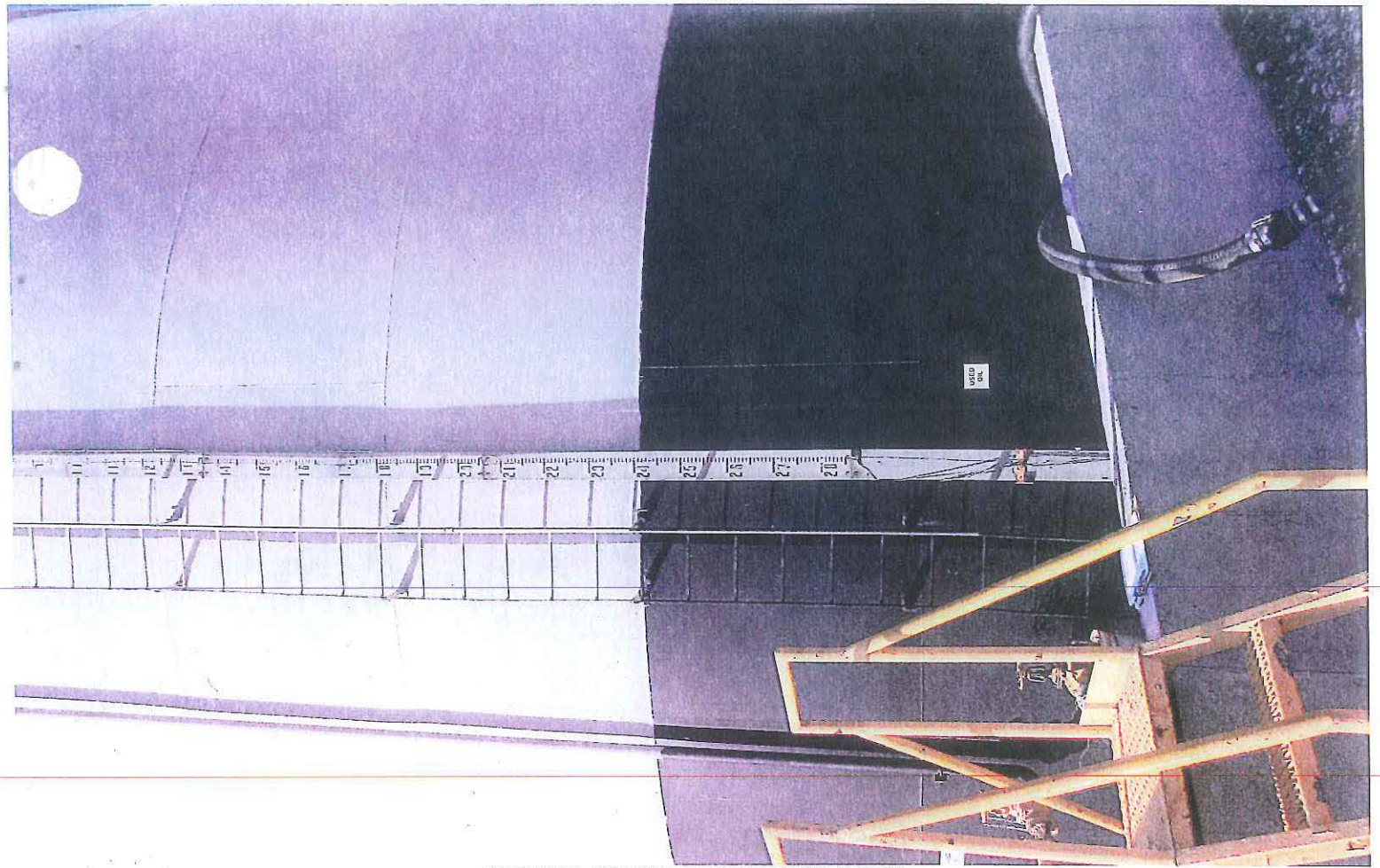
Ortek Photo 42 by Mike Beedle, 2011/12/09 14:21:54



Ortek Photo 43 by Mike Beedle, 2011/12/09 14:21:59



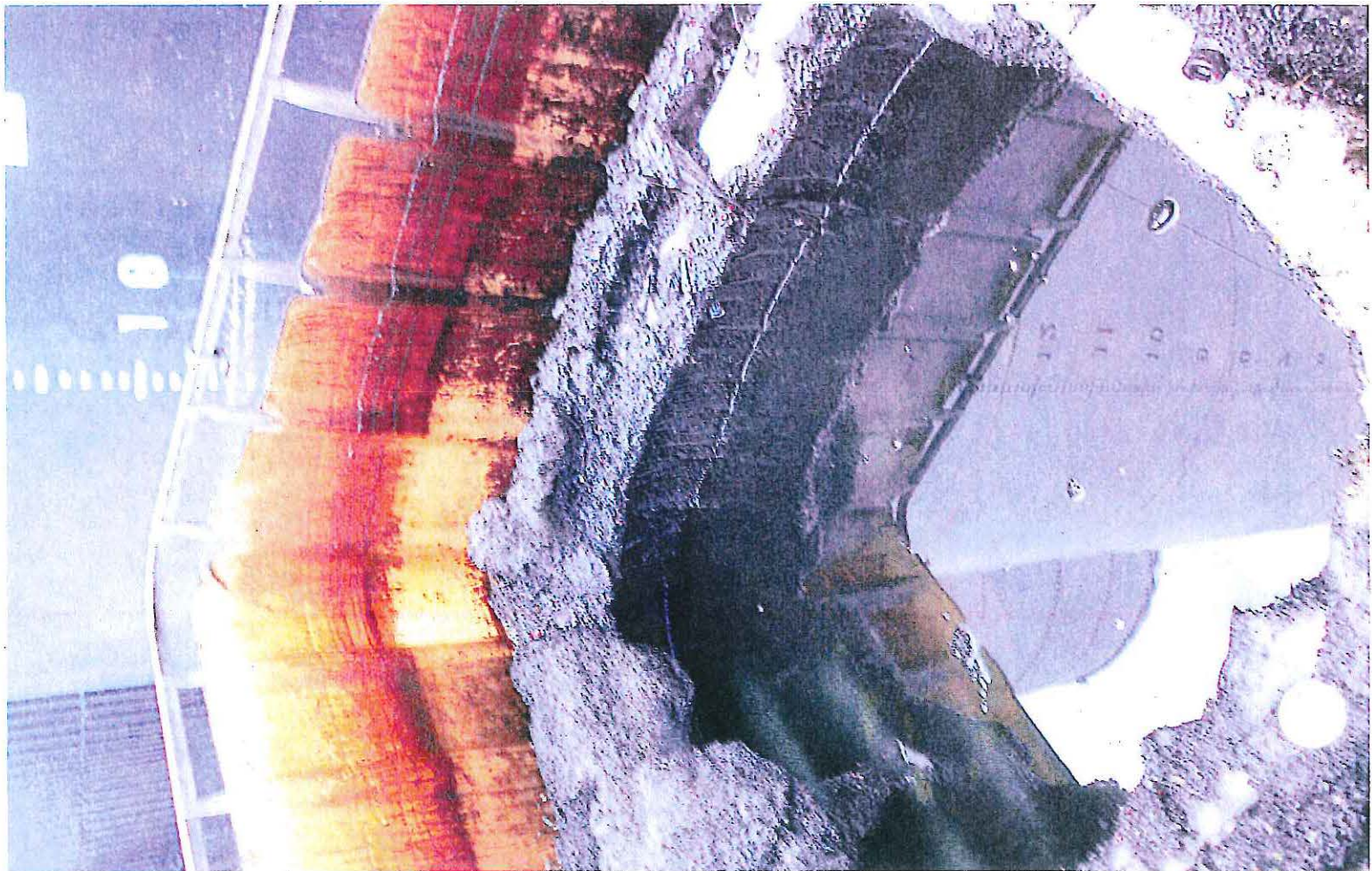
Ortek Photo 44 by Mike Beedle, 2011/12/09 14:30:12



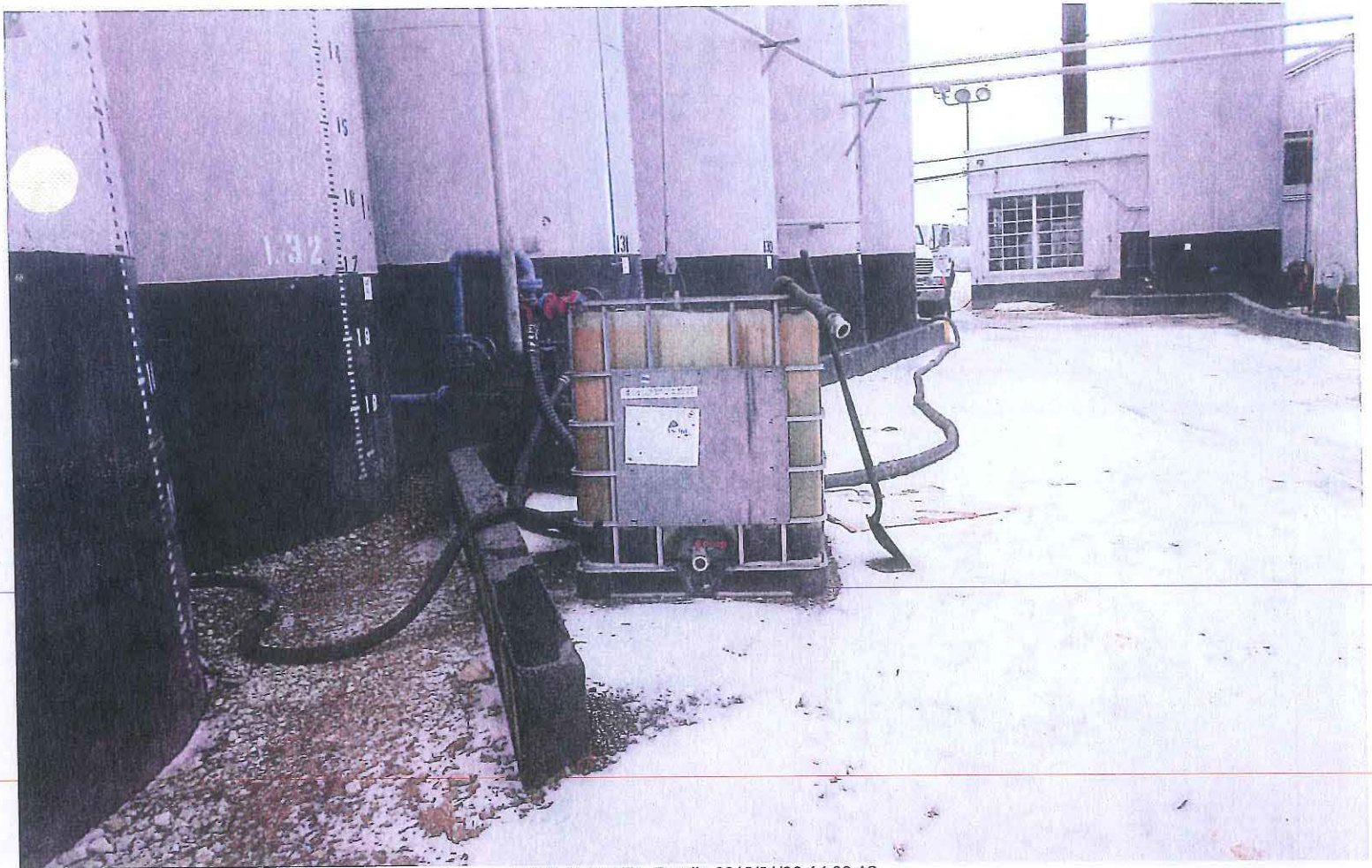
Ortek Photo 45 by Mike Beedle, 2011/12/09 14:30:27



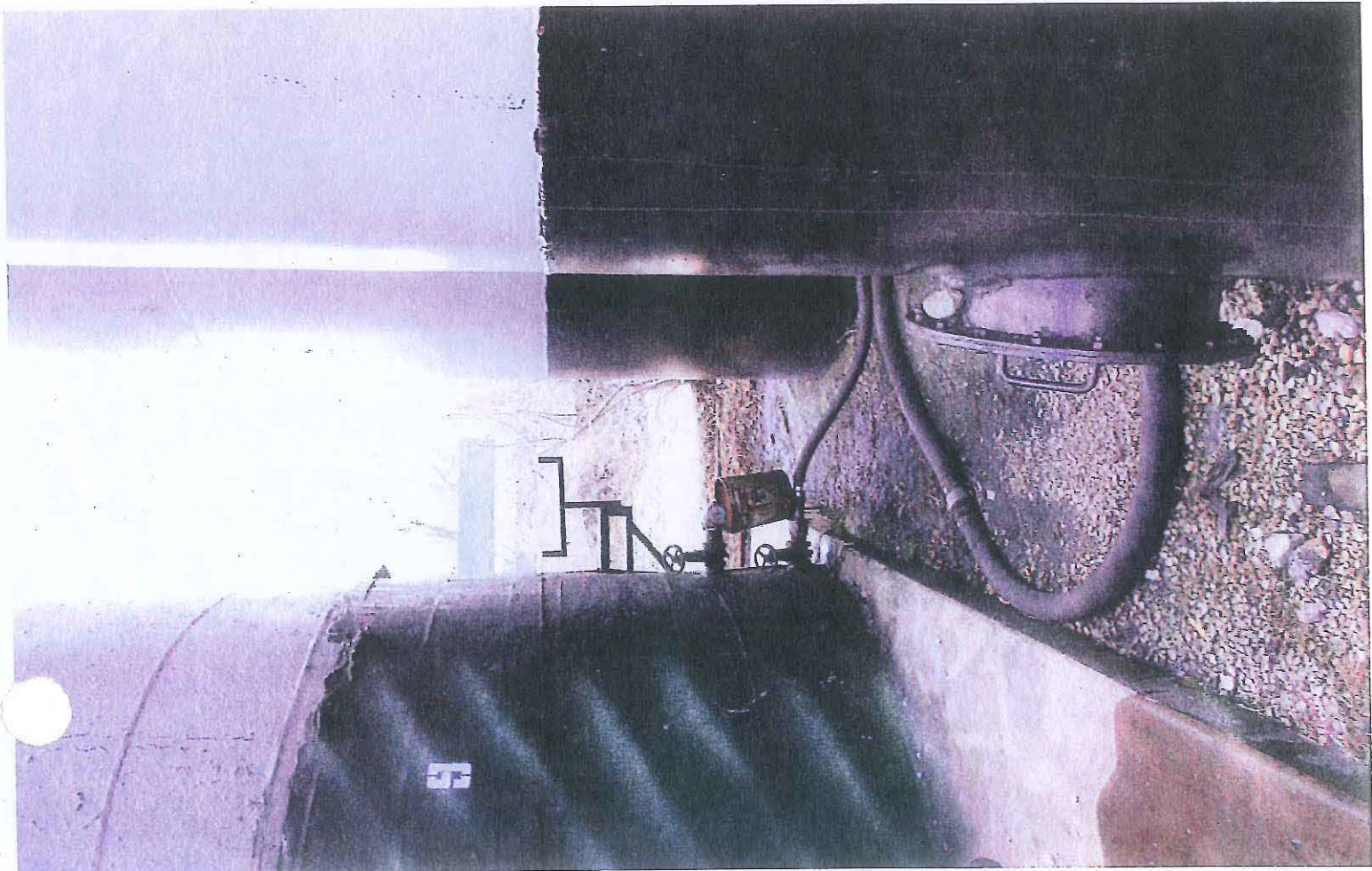
Ortek 46 by Mike Beedle,2012/01/30 14:35:49



Ortek 47 by Mike Beedle,2012/01/30 14:35:59



Ortek 48 by Mike Beedle, 2012/01/30 14:36:18



Ortek 49 by Mike Beedle, 2012/01/30 14:36:52



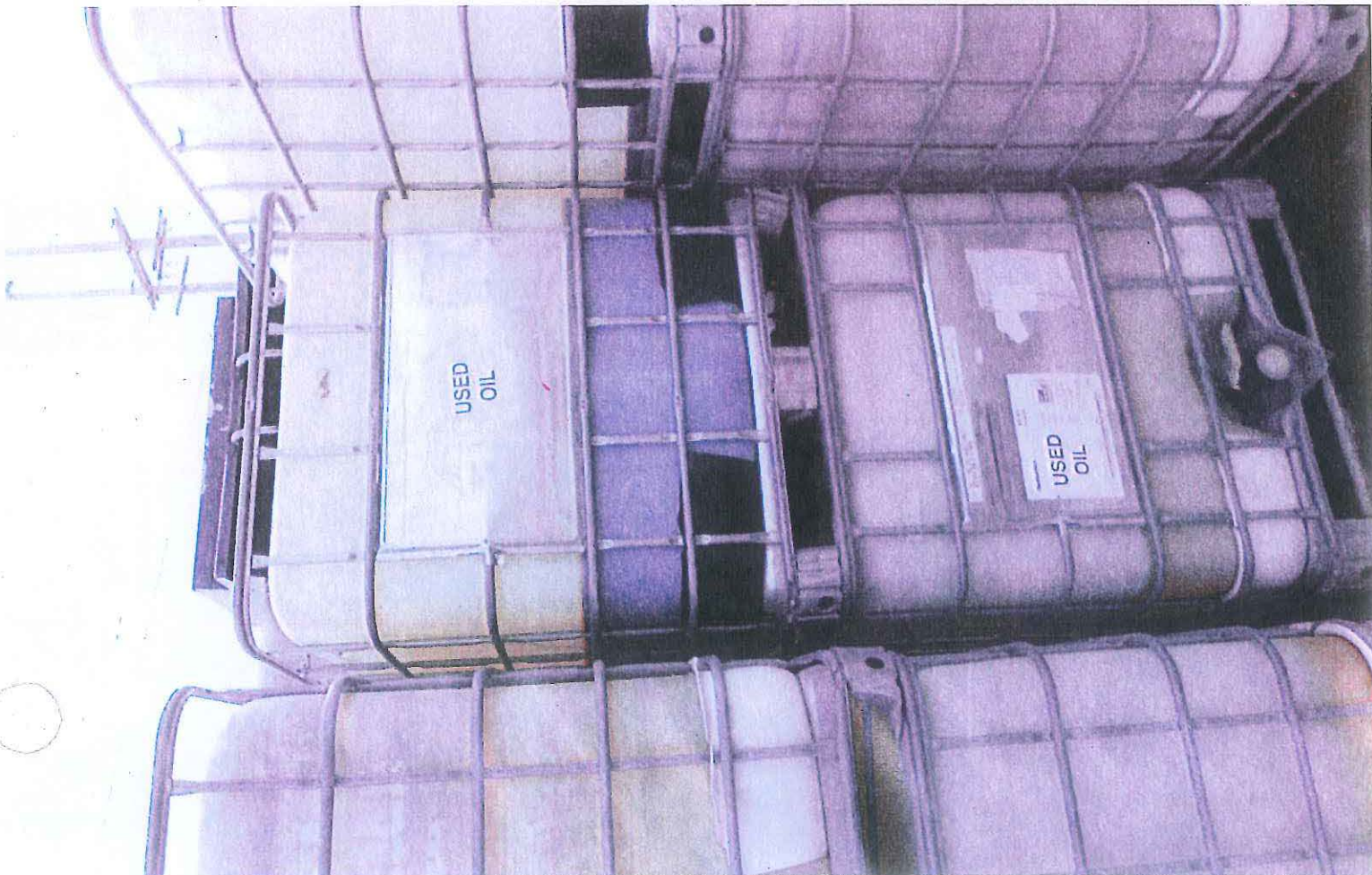
Ortek 50 by Mike Beedle,2012/01/30 14:38:38



Ortek 51 by Mike Beedle,2012/01/30 14:39:25



Ortek 52 by Mike Beedle, 2012/01/30 14:39:37



Ortek 53 by Mike Beedle, 2012/01/30 14:42:25



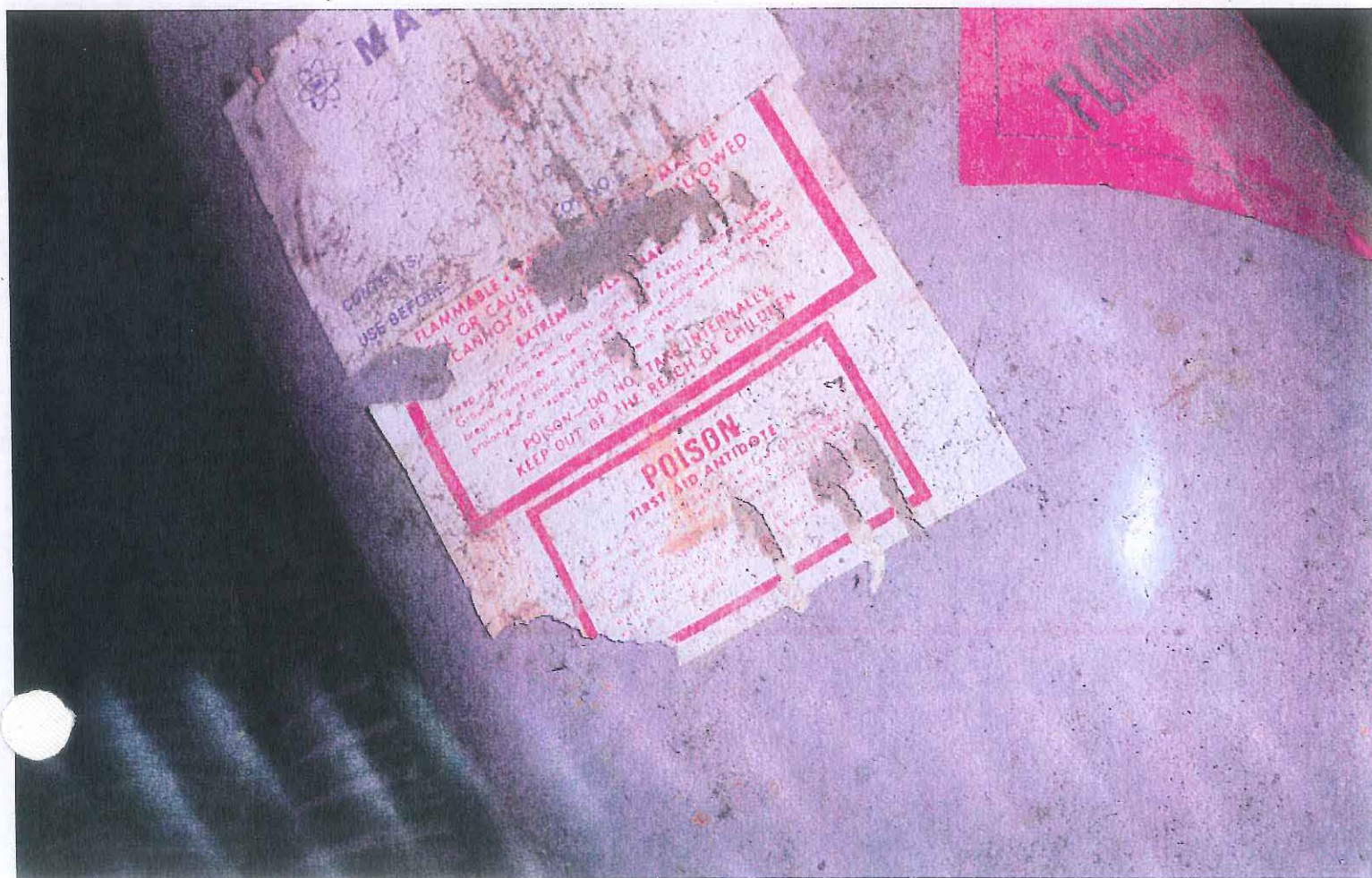
Ortek 54 by Mike Beedle, 2012/01/30 14:42:30



Ortek 55 by Mike Beedle, 2012/01/30 14:42:36



Ortek 56 by Mike Beedle,2012/01/30 14:45:14



Ortek 57 by Mike Beedle,2012/01/30 14:47:32



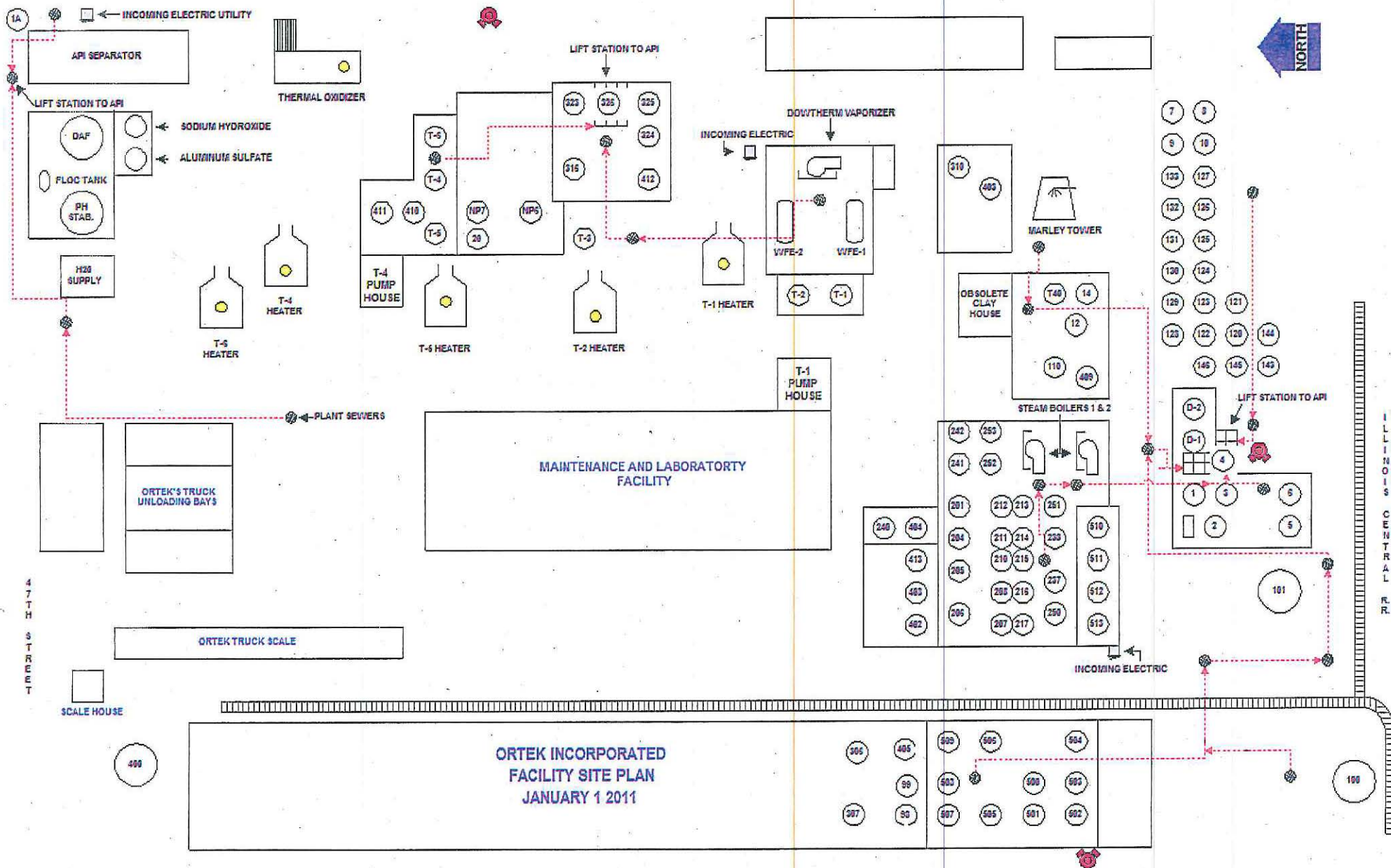
Ortek 58 by Mike Beedle, 2012/01/30 14:47:48



Ortek 59 by Mike Beedle, 2012/01/30 14:50:02

ATTACHMENT B

Site Diagram



ATTACHMENT C

RS Hazardous Waste Shipments

RS USED OIL SERVICES OUTBOUND TANK #146 - #122 - #120

11/1/2011

[illegible]

Subject: Contact information
From: BILL KENNEDY (BILL@rsusedoil.com)
To: akalmar@r3environmental.net; taylorlw57@yahoo.com;
Date: Friday, October 28, 2011 11:40 AM

Good morning Alan/Laurie,

This e-mail is intended to provide contact information for all parties.

Alan Kalmar

R3 Environmental

Non-responsive (Cell)

Laurie Witter

Ortek

708-762-5119 (Office)

Alan, please reach out to Laurie and discuss a time for loading product.

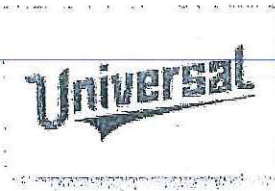
The tanks R3 will be taking are:	T-120 with approximately 14,000 gallons
	T-122 with approximately 18,000
gallons	
	T-146 with approximately 19,000
gallons	

Laurie, I am working with operations in Monee and should be able to move tanks 132

and 500 within a few weeks.

Please do not hesitate to call me if there are any questions or concerns.

Have a good weekend, Bill



William J Kennedy | Director, Safety & Compliance
Universal Lubricants, LLC

708.534.9300 Phone ■ **Non-responsive** Mobile
708.534.9400 Fax ■ ■ ■

Universallubes.com | EcoUltraOil.com

601 WEST 47TH STREET
MCCOOK, ILLINOIS 60525
PHONE: (708) 762-5117
FAX: (708) 762-5118

ORTEK, INC.

Fax

To: Latishia

From: Laurie Witter

Co: Universal Scientific

Pages: (6) including cover page

Fax: 316-832-3777

Phone:

Date: Nov. 3, 2011

Re:

cc:

☒ **Urgent**

☐ **For Review**

☐ **Please Comment**

☐ **Please Reply**

☐ **Please Recycle**

Per our conversation 11/3/11.

This product is scheduled to be picked-up by R.S. Used Oil. Product did not meet specs.

Thank you, Laurie

confidential

ORTEK INC.

7601 West 47th Street, McCook, Illinois 60525

DRIVER'S COPY

97035

Customer Busco

Truck No. 81-07

Address _____

Rail Car No. _____

Carrier Zion End

Unloaded By _____

36020 1b
00 1b
36020 1b
06:07:59

GROSS

Gross Weight: 76320 lb

TARE

Tare Weight: 00 lb

NET

Net Weight: 76320 lb

57 NOV 2011 07:28:48

ANALYSIS	
B.S. & W.	
VIS @ 100	
FUEL DEL.	
CHLORINE	

Gross Weight:
Tare Weight:
Net Weight:
07 NOV 2011

Type Oil _____ To Tank From 746

Gross Gals. _____ Ded. _____ Net Gals. 5,490

WEIGHER _____

SHIPPER _____

Driver's Signature _____

GENERATOR	UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number H R000167478	2. Page 1 of 1	3. Emergency Response Phone (800) 424-9346	4. Manifest Tracking Number 001528724 GBF			
	5. Generator's Name and Mailing Address RS Used Oil Services, Inc. 25903 S. Ridgeland Avenue Monee, IL 60449 Generator's Phone: (708) 344-0200 ATTN: William Kennedy				Generator's Site Address (if different than mailing address) 7601 W. 47 th Street McCook, IL 60625				
	6. Transporter 1 Company Name Ziron Environmental Services, Inc.				U.S. EPA ID Number ILR000107891				
	7. Transporter 2 Company Name				U.S. EPA ID Number				
	8. Designated Facility Name and Site Address Greencastle WOB Facility 3301 South County Road 150 W Greencastle, IN 46133 Facility's Phone: (800) 555-3485				U.S. EPA ID Number IND000419212				
	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes
	X	1. RQ, UN1992, Waste Flammable Liquids, Toxic, H.O.2, (6.1), PG II (RQ-D001) (Petroleum Distillates, Tetrachloroethylene)			001 TT		5600	0	D001 D006 D039
		2.							
		3.							
		4.							
	14. Special Handling Instructions and Additional Information WHYERQ# 131, Problem# 18 03385 11/07/77 7786 212 Job no. 110779								
	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
	Generator's/Offeror's Printed/Typed Name				Signature		Month Day Year		
					on behalf of RS Used Oil Services				
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
	17. Transporter Acknowledgment of Receipt of Materials								
	Transporter 1 Printed/Typed Name				Signature		Month Day Year		
	Transporter 2 Printed/Typed Name				Signature		Month Day Year		
SIGNATURE FACILITY	18. Discrepancy								
	18a. Discrepancy Indication: Space: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number				
	Facility's Phone:								
	18c. Signature of Alternate Facility (or Generator)						Month Day Year		
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
	1.		2.		3.		4.		
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
	Printed/Typed Name				Signature		Month Day Year		

**Ziron Environmental Services, Inc.**

302 E 25th St.

Chicago Heights, IL 60411

708-757-9601

SERVICE CALL SHEET - MAINTENANCE

Date: 11/7/11

Ziron Job # 77786212

Customer PO # Alan R-3

Customer Information

Station #

Generator #

Notify # Alan R-3

Shutdown - Yes / No

Reg / OT / Hol

Mileage Upon Arrival 478434

Name: Ortek

Street: 7601 W. 47th St.

City/State: McCook, IL

Job Description: Pull load of Oil Transport to Greencastle, IN.

Employee Name(s)

Role

Driver / Laborer

Driver / Laborer

Driver / Laborer

Truck # 81-07

Trailer # 8-01

Destination

Site

Dump

Shop

Other

Fills

Pumped

STPs

Pumped

Vapor Recoveries

Pumped

Dispenser Pans

Pumped

Regular Fill

Regular STP

Regular Vapor Recovery

Disp. 1/2

Midgrade Fill

Midgrade STP

Midgrade Vapor Recovery

Disp. 3/4

Premium Fill

Premium STP

Premium Vapor Recovery

Disp. 5/6

Diesel Fill

Diesel STP

Diesel Vapor Recovery

Disp. 7/8

Kerosene Fill

Kerosene STP

Kerosene Vapor Recovery

Disp. 9/10

Disp. 11/12
Disp. 13/14

Tank

Water Height

Gallons Pumped

Notes:

Regular

Midgrade

Premium

Diesel

Kerosene

Dewatered location

Yes / No

All Functions Normal

Yes / No

Veeder Root Print Out Attached

Yes / No

Veeder Root Q#

Gloves: _____

JOB CLEARANCE FORM

Safety Vest: _____

Safety Glasses: _____

Sign In: _____

Sign Out: _____

Hearing Protection: _____

Hard Hat: _____

Steel Toe Boots: _____

Contractor: C. McKay

JSA # 3

Type of Material: Flammable Liquids

Dumped and turned in:

Yes / No

Left in unit for later disposal:

Yes / No

Transferred to:

Total Gallons: 5600

Disposal Facility & Location:

WDF Greencastle, IN.

Manifest

Bill of Lading

Document # 1528724 GBF

X Leobardo Ortega 11/7/11

Customer Signature:

Date:

A. Generator Name RS Used Oil Services, Inc.

Address: 7601 W. 47th St.

Profile# (a) LS_03385

Waste(s) contained in this shipment and referenced by the above Manifest number that are listed below are subject to the treatment standards set forth in 40 CFR 160.40. For each waste code, list the corresponding Subcategory, if applicable. Record an "X" in the appropriate column below for Treatability Group and each disclosure form attached.

(*) Include drum number if this waste pertains to a lab pack.

D. LAB PACK CERTIFICATION: If your waste is packaged in lab packs and does not contain any waste codes in Appendix W (see list below), the following certification must be completed and the corresponding container numbers must be listed also. If the waste is packaged in lab packs and does include waste codes in Appendix W (W), then table c (page 2) must be completed for those containers and the respective waste codes.

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack does not contain any wastes identified at 40 CFR 268.42 (c) (2). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

8-01

TK-146

E. Notification Statement: This waste must be treated to the applicable treatment standards set forth in 40 CFR 260 Subpart D, Section 268.32, or RCRA Section 3004 (d). Waste analysis is attached where available, otherwise the information herein is based upon my through knowledge of the waste(s). I hereby certify that the information provided is complete and accurate based on my knowledge of the material.

11-7-61

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 0000067178	2. Page 1 of 1	3. Emergency Response Phone (800) 431-8300	4. Manifest Tracking Number 001528685 GBF			
5. Generator's Name and Mailing Address RS Used Oil Services, Inc. 2593 S. Ridgeland Avenue Mound, IL 60449 Generator's Phone: (708) 431-0300 ATTN: William Kottwitz			Generator's Site Address (if different than mailing address) 7601 W. 47 th Street McCook, IL 60425					
6. Transporter 1 Company Name Zion Environmental Services, Inc.			U.S. EPA ID Number ILD000107581					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address Greencastle WDF Facility 301 South County Road 150 W Greencastle, IN 46135 Facility's Phone: (800) 533-3435			U.S. EPA ID Number IND006119212					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes	
		1. (RQ) UN1992, Waste Flammable Liquids, Toxic, n.o.s. (6.1), PG II (RQ-D001) Petroleum Distillates, Tetrahydroethylene	001	T.D.	5500	g	D001	D008
		2.						
		3.						
		4.						
14. Special Handling Instructions and Additional Information 9001 ERS 131 Profile ES 03383 6107 77786165 Job no. 110765								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name			Signature			Month Day Year		
			on behalf of RS Used Oil Services					
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit:					
	Transporter signature (for exports only):		Date leaving U.S.:					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name William McKay	Signature [Signature]	Month		Day		Year	
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name		Signature		Month		Day Year	
18. Discrepancy								
18a. Discrepancy Indication Space: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input checked="" type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number:								
18b. Alternate Facility (or Generator)						U.S. EPA ID Number		
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name			Signature			Month Day Year		

Account Statement



RS Used Oil Services, Inc
 25903 S. Ridgeland Avenue
 Monee IL 60449
 708 534 9300

Page: 1 of 1

Billing Address: 28036-000

ORTEK OIL CO
 7604 W 47TH ST
 MCCOOK IL 60525
 US

Document Information

Statement Date: 07/07/2011
Acct Statement Period: 06/01/2011 - 06/30/2011

Invoice Number Text/Reference	Doc Type	Document Date	Arrears On 06/30/2011	Amount
Open items on 06/30/2011:				
0010330093	01	02/14/2011	126	11,179.35
0010336581	01	03/07/2011	105	802.90
0010342589	01	03/25/2011	87	1,239.00
0010345386	01	04/05/2011	86	1,650.00
0010350633	01	04/14/2011	77	6,546.90
0010353792	01	05/02/2011	59	4,154.27
0010356082	01	05/06/2011	55	514.03
0010360122	01	05/09/2011	42	4,001.40
0010360123	01	05/17/2011	34	3,180.60
0010362300	01	05/27/2011	24	1,245.60
Balance on 06/30/2011.....				34,514.05
<p><i>sent back or offset on manifests per Laurie Watter MB 12/4/11</i></p> <p><i>Taken off \$15,397.20</i></p>				
				<p><i>\$16,117.45</i></p> <p><i>Due</i></p> <p><i>10/8/11</i></p>

Document Type: 01 = Invoice; 03 = Finance Charge; 06 = Partial Payment; 11 = Credit Memo; 15 = Payment

CURRENT	OVERDUE 1 - 30	OVERDUE 31 - 60	OVERDUE 61 - 90	OVERDUE 91 +	ACCT BALANCE
0.00	1,245.60	11,850.30	9,435.90	11,982.25	\$ 34,514.05

ATTACHMENT D

RS Used Oil

4/14/11 Shipment Information

ORTEK INC.

7601 West 47th Street, McCook, Illinois 60525

ACCOUNTING COPY

95306

Customer RS USED OIL

Truck No. 969/T590

Address MONROE, IL

Rail Car No. _____

Carrier RS

Unloaded
By _____

lb
29640
00 lb
29640 lb

16:31:23

77500 GROSS

Gross Weight: 77500 lb

29640 TARE

Tare Weight: 00 lb

47860 NET

Net Weight: 77500 lb

14 Apr 2011 14:19:19

ANALYSIS	
B.S. & W.	
VIS @ 100	
FUEL DEL.	
CHLORINE	

Gross Weight:
Tare Weight:
Net Weight:

14 Apr 2011

Type Oil _____

To Tank 500

Gross
Gals. 6556.6581

Ded. _____

Net
Gals. _____

WEIGHER _____

SHIPPER _____

Driver's
Signature [Signature]



RS Used Oil Services, Inc
25903 S. Ridgeland Avenue
Monee IL 60449
708 534 9300

INTERNAL USE ONLY: 633-546-1-1

Page: 1 of 1

Invoice

Information

Invoice Number: 10350633
Document Date: 04/14/2011
Delivery Note: 500360926
Order number: 100369199
Purchase Order No: 55112
Purchase Order Date: 04/14/2011
Payment Terms: CASH UPON DELIVERY
Billing Date: 04/14/2011
Invoice Amount: 6,546.90 USD

*** PLEASE RETURN ONE COPY OF INVOICE WITH PAYMENT ***

Billing Address: 28036-000 (Acct No)

ORTEK OIL CO
7604 W 47TH ST
MCCOOK IL 60525

Remit Payment To

RS Used Oil Services, Inc
PO Box 2920
Wichita, KS 67201-2920

Ship-to: 28036-000

ORTEK OIL CO
7604 W 47TH ST
MCCOOK IL 60525
7087625117

Shipping Instructions:

Material Description	Order Qty	Invoice Qty	Unit Price	Amount
10000005748 RS USED OIL Cust. Material No.: WO# 55112	6,381 GAL	6,381 GAL	0.95	6,061.95
			Tax	484.95
			Total	\$ 6,546.90

4/14/11

RS Used Oil Services, Inc.

SERVICE ORDER

No. 55112

25903 South Ridgeland Ave.
Monee, Illinois 60449
(708) 534-9300 Fax: (708) 534-9400
PA ID # ILR000103184
S DOT # 758189

Location Performing Service
25903 S. Ridgeland Ave.
Monee, IL 60449
(708) 534-9300
EPA ID # ILR000103184

Date: 04/14/2011

Manifest #

Route #

Generator/Customer/Job Site:

Name:

ORTEK OIL CO.

Address:

7801 W 47TH STREET

City, State, Zip:

MC COOK

IL 60525

Phone Number:

708-762-5117

Contractor:

Name:

ORTEK OIL CO.

Address:

7801 W 47TH STREET

City, State, Zip:

MC COOK

IL 60525

Phone Number:

708-762-5117

Purchase Order Number:

Burner's USEPA ID #:

Quantity	Description	Unit Price	Total	Gross	Tare	Net
	Non-Hazardous Used Oil Collected					
	Non-Hazardous Oily Water					
	Non-Hazardous Contaminated Oil Collected					
	Service Charge					
	Hourly Charge					
	Drum(s): Used Oil Filters					
	Drum(s): Non-Hazardous Solids/Liquids					
6381	65556 Gal On-Spec Used Oil Delivered	9.5	\$6,061.95	5775.00	296.40	4786.60

Generator Certification: I, the generator (or agent for) of this product, hereby certify that the waste identified on this document does not contain or has not come in contact with a hazardous waste listed under 40 CFR 261.30 - 261.33 and is non-hazardous according to 40 CFR 261.1- 261.20. I hereby declare that the contents of this consignment are fully and accurately described by the proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. I hereby certify that to the best of our knowledge, this company and facility does not generate waste that would require submittals of a Special Waste Disposal Request Form. Additionally, upon generating such wastes, we will notify in writing RS Used Oil Services, Inc. and submit all request forms. Disposal of such materials will be performed upon approval of RS Used Oil Services, Inc. Used oil contained within non-hazardous special waste collected in LA is subject to regulation by the LA DEQ under LAC Gov. Chapter 41, Subpart C. Emergency Response Number: National 1-800-424-8802 T.N.R.C.C. 1-512-239-1000

I hereby certify that the above description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of compositions or properties exists and that the waste is not designated a hazardous waste by the USEPA or any state agency pursuant to the RCRA of 1976 or contains PCB's regulated by TSCA; 40 CFR 761.

Customer agrees to pay a late charge of 1% per month on any invoice, which is not paid within 30 days of invoice date. Customer also agrees to pay any attorney's fees and court costs in the event it becomes necessary to initiate legal proceedings to collect the invoice.

Printed Customer Name

L. Diller

Customer Signature

Date

4/14/11

Arrival Time:

Begin Loading:

End Loading:

Depart Time:

Remarks:

TANKER

Next Service Date: Oil

Filter

Driver Name

L. Gloor

Driver Signature

Office Use Only

Payment Received From Customer Yes No (To Be Invoiced)

Amount

\$6,061.95

Check

Cash

Office Use Only

Amount

Check Cash Credit Card

DRIVER

100869179
500860926

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 2010300031	2. Page 1 of 1	3. Emergency Response Phone 708 5349300	4. Manifest Tracking Number 008131901 JJK		
5. Generator's Name and Mailing Address ROCKFORD PRODUCTS 701 HARRISON AVE ROCKFORD IL 61109		Generator's Site Address (if different than mailing address)					
Generator's Phone: 815-229-4315							
6. Transporter 1 Company Name RS Used Oil Services Inc		U.S. EPA ID Number IL000100184					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address UNIT INC 701 W 47th St McCook IL 60526		U.S. EPA ID Number IL01740002					
Facility's Phone: 708 702-5117							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes
			No.	Type			
	1. Flammable Corrosive Liquid		001	TT	6523		
	2.						
	3.						
4.							
14. Special Handling Instructions and Additional Information TICKET W00# 56111 TRANSPORTER# UPW02581834L IL ID# 1970655029							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name Dan Burke gm		Signature Dan Burke gm		Month 4		Day 14	
16. International Shipments <input type="checkbox"/> Import to U.S. Transporter signature (for exports only):		<input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:			
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name DAVE GLAESER		Signature Dave Glaeser		Month 04		Day 14	
Transporter 2 Printed/Typed Name		Signature		Month		Day	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1		2		3		4	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a.							
Printed/Typed Name Robert Kolan		Signature Robert Kolan		Month 11		Day 14	

RS Used Oil Services, Inc.

SERVICE ORDER

No. 55112

25903 South Ridgeland Ave.
Monee, Illinois 60449
(708) 534-9300 Fax: (708) 534-9400
EPA ID # ILR000103184
DOT # 758189

Location Performing Service
25903 S. Ridgeland Ave.
Monee, IL 60449
(708) 534-9300
EPA ID # ILR000103184

Date: 04/14/2011

Manifest #

Route #

Generator/Customer/Job Site:

Name:

ORTEK OIL CO.

Address:

7801 W 47TH STREET

City, State, Zip:

MC COOK

IL 60525

Phone Number:

708-782-5117

Contractor:

Name:

ORTEK OIL CO.

Address:

7801 W 47TH STREET

City, State, Zip:

MC COOK

IL 60525

Phone Number:

708-782-5117

Purchase Order Number:

Burner's USEPA ID #:

Quantity	Description	Unit Price	Total	Gross	Tare	Net
	Non-Hazardous Used Oil Collected					
	Non-Hazardous Oily Water					
	Non-Hazardous Contaminated Oil Collected					
	Service Charge					
	Hourly Charge					
	Drum(s): Used Oil Filters					
	Drum(s): Non-Hazardous Solids/Liquids					
6381	6556 GAL On-Spec Used Oil Delivered			77500	29640	47860

Generator Certification: I, the generator (or agent for) of this product, hereby certify that the waste identified on this document does not contain or has not come in contact with a hazardous waste listed under 40 CFR 261.30 - 261.33 and is non-hazardous according to 40 CFR 261.1 - 261.20. I hereby declare that the contents of this consignment are fully and accurately described by the proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. I hereby certify that to the best of our knowledge, this company and facility does not generate waste that would require submittals of a Special Waste Disposal Request Form. Additionally, upon generating such wastes, we will notify in writing RS Used Oil Services, Inc. and submit all request forms. Disposal of such materials will be performed upon approval of RS Used Oil Services, Inc. Used oil contained within non-hazardous special waste collected in LA is subject to regulation by the LA DEQ under LAC Gov. Chapter 41, Subpart C. Emergency Response Number: National 1-800-424-8802 T.N.R.C.C. 1-512-239-1000

I hereby certify that the above description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of compositions or properties exists and that the waste is not designated a hazardous waste by the USEPA or any state agency pursuant to the RCRA of 1976 or contains PCB's regulated by TSCA, 40 CFR 761.

Customer agrees to pay a late charge of 1% per month on any invoice, which is not paid within 30 days of invoice date. Customer also agrees to pay any attorney's fees and court costs in the event it becomes necessary to initiate legal proceedings to collect the invoice.

Printed Customer Name

L. Ditter

Customer Signature

[Signature]

Date

4/14/11

Arrival Time:

Begin Loading:

End Loading:

Depart Time:

Remarks:

TANKER

Next Service Date: Oil

Filter

Driver Name

D Glaeser

Driver Signature

[Signature]

Office Use Only

Payment Received From Customer Yes No (To Be Invoiced)

Amount

Check

Cash

Office Use Only

Amount

Check

Cash

Credit Card

CUSTOMER

RS

USED OIL SERVICES, INC.

FACSIMILE TRANSMITTAL SHEET

TO: LAURIE FROM: DAN
FAX NUMBER: 762-5118 DATE: 4/14/11
COMPANY: TOTAL NO. OF PAGES INCLUDING COVER: 4

PHONE NUMBER: SENDER'S REFERENCE NUMBER:

RE: YOUR REFERENCE NUMBER:

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

REBUTTAL FOR MATERIAL COMING IN

THIS AFTERNOON.

25903 S. RIDGELAND AVE. • MONEE, IL. 60449
PHONE: 708-534-9300 • FAX: 708-534-9400

HP LaserJet M2727nf MFP

Fax Confirmation Report

HP LASERJET FAX
17087625118
Apr-13-2011 1:45PM

Job	Date	Time	Type	Identification	Duration	Pages	Result
195	4/13/2011	1:44:56PM	Receive	17085349400	0:55	4	OK

04/14/2011 THU 14:50 FAX 17085349400 RS Used Oil

001/004

RS

USED OIL SERVICES, INC.

FACSIMILE TRANSMITTAL SHEET

TO: LAURIE	FROM: DAN
FAX NUMBER: 762-5118	DATE: 4/14/11
COMPANY:	TOTAL NO. OF PAGES INCLUDING COVER: 4
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS

REBUTAL FOR MATERIAL COMING IN

THIS AFTERNOON.

25903 S. RIDGELAND AVE. • MONEE, IL. 60449
PHONE: 708-534-9300 • FAX: 708-534-9400

From:

03/31/2011 17:20

#254 P.006/008

**SUMMIT**
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories*For tank 500
material*

Page 4

March 31, 2011

Client: RS Used Oil Service, Inc.
Address: 25903 S. Ridgeland
Monee, IL 60449Date Collected: 03/29/2011
Date Received: 03/30/2011
Project #: Rock Ford Products
Client ID #: RP32911
Laboratory ID #: 1105928-01
Matrix: Liquid

<u>Parameter</u>	<u>Method</u>	<u>Results</u>	<u>Date of Analysis</u>
% Water	D6304	2.41%	03/31/2011
API	D4052	24.0	03/31/2011
Arsenic	6010	<1.0ppm	03/30/2011
Ash	D482-02	0.55%	03/31/2011
BTU/gal	D-240-09	136381/gal	03/31/2011
BTU/lb	D-240-09	17997/lb	03/31/2011
Cadmium	6010	0.29ppm	03/30/2011
Chromium	6010	<4.0ppm	03/30/2011
Flash Point	1010	>200°F	03/30/2011
Lead	6010	4.6ppm	03/30/2011
PCB	8082	<1.0ppm	03/30/2011
Sulfur, Wt%	D-4294	0.8847%	03/31/2011
Total Halogen, PPM	9075	6824ppm	03/31/2011
Viscosity SUS@100F	D-445	369	03/31/2011

"Analytical Integrity" • EPA Certified • NELAP Certified
3310 Wln Street • Cuyahoga Falls, Ohio 44223 • Phone: 330-253-8211 • Fax: 330-253-4489
Web Site: www.settek.com

From:

03/31/2011 17:21

#254 P.007/008



SUMMIT
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

March 31, 2011

Page 5

Client: RS Used Oil Service, Inc.
Address: 25903 S.Ridgeland
Monee, IL 60449

Date Collected: 03/29/2011
Date Received: 03/30/2011
Project #: Rock Ford Products
Client ID #: RP32911
Laboratory ID #: 1105928-01
Analysis: Chlorinated VOC
Method: 8260
Matrix: Liquid
Date of Analysis: 03/30/2011
Analyst: MS

Chlorinated VOC

<u>Parameter</u>	<u>Reporting Limit (ppm)</u>	<u>Results (ppm)</u>
1,1,1,2-Tetrachloroethane	5.0	BRL
1,1,1-Trichloroethane	5.0	BRL
1,1,2,2-Tetrachloroethane	5.0	BRL
1,1,2-Trichloroethane	5.0	BRL
1,1-Dichloroethane	5.0	BRL
1,1-Dichloroethene	5.0	BRL
1,1-Dichloropropene	5.0	BRL
1,2,3-Trichlorobenzene	5.0	BRL
1,2,3-Trichloropropane	5.0	BRL
1,2,4-Trichlorobenzene	5.0	BRL
1,2-Dibromo-3-chloropropane	5.0	BRL
1,2-Dichlorobenzene	5.0	BRL
1,2-Dichloroethane	5.0	BRL
1,2-Dichloropropane	5.0	BRL
1,3-Dichlorobenzene	5.0	BRL
1,3-Dichloropropane	5.0	BRL
1,4-Dichlorobenzene	5.0	BRL
2,2-Dichloropropane	5.0	BRL
2-Chlorotoluene	5.0	BRL
4-Chlorotoluene	5.0	BRL
Bromochloromethane	5.0	BRL
Bromodichloromethane	5.0	BRL

"Analytical Integrity" • EPA Certified • NELAP Certified
3310 Win Street • Cuyahoga Falls, Ohio 44223 • Phone: 330-253-8211 • Fax: 330-253-4489
Web Site: www.sellek.com

From:

03/31/2011 17:21

#254 P.008/008



March 31, 2011

Page 6

Client: RS Used Oil Service, Inc.
Address: 25903 S.Ridgeland
Monee, IL 60449

Date Collected: 03/29/2011
Date Received: 03/30/2011
Project #: Rock Ford Products
Client ID #: RP32911
Laboratory ID #: 1105928-01
Analysis: Chlorinated VOC
Method: 8260
Matrix: Liquid
Date of Analysis: 03/30/2011
Analyst: MS

Chlorinated VOC

<u>Parameter</u>	<u>Reporting Limit (ppm)</u>	<u>Results (ppm)</u>
Carbon Tetrachloride	5.0	BRL
Chlorobenzene	5.0	BRL
Chloroethane	5.0	BRL
Chloroform	5.0	BRL
Chloromethane	5.0	BRL
cis-1,2-Dichloroethene	5.0	BRL
Dibromochloromethane	5.0	BRL
Dichlorodifluoromethane	5.0	BRL
Hexachlorobutadiene	5.0	BRL
Methylene Chloride	5.0	BRL
Tetrachloroethene	5.0	BRL
trans-1,2-Dichloroethene	5.0	BRL
Trichloroethene	5.0	BRL
Trichlorofluoromethane	5.0	BRL
Vinyl Chloride	5.0	BRL
Ethane, 1,1,2-trichloro-1,2,2-trifluoro-	5.0	BRL

ATTACHMENT E
Orteck's Notification

RCRA Site Detail

Report run on: December 16, 2011 - 5:51 PM

Page 3

ORTEK INC **ILD000646**
EPA Region:05 Extract:Y County: COOK State District:

Universes	Federal Generator: N	Transporter: N	Operating TSDF: ---	Active: Y
	State Generator:	Importer: N	Commercial: N	El Indicator (HE / GW): N / N
	Short Term Generator: N	Mixed Waste Generator: N	HSM: N	IC In Place: N
	Subpart K/College: N	Subpart K/Hospital: N	Subpart K/Non-profit: N	Subpart K/Withdrawal: N

Latitude/Longitude Measure - Owner: Seq #:
 Coordinates:

Receive Date: 06/06/2007 Source Type: Implementer Seq. Number: 1

Location 7601 W 47TH ST Address: MC COOK, IL 60525	Mailing 7601 W 47TH ST Address: MCCOOK, IL 60525 UNITED STATES
---	--

Contact Person LOWELL D. AUGHENBAUGH 7601 W 47TH ST
 For Source (708) 762-5117 MCCOOK, IL 60525
 Information UNITED STATES

Owner (current) 7601 W 47TH ST Type: Private
 NAWRC MCCOOK, IL 60525 Phone: (412) 856-6100
 From: 10/01/2003 To: MCCOOK

Operator (current) 7601 W 47TH ST Type: Private
 ORTEK INC MCCOOK, IL 60525 Phone: (708) 762-5117
 From: 12/15/1996 To: MCCOOK

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 562219 OTHER NONHAZARDOUS WASTE TREATMENT AND DISPOSAL

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator: No	Used Oil Activities	
Importer Activity: No	Used Oil Transporter Activity	Off-Specification Used Oil Burner: No
Mixed Waste Generator: No	Transporter: No	Used Oil Fuel Marketer Activity
Transporter Activity: No	Transfer Facility: No	Marketer who directs shipment of off-specification used oil to off-specification used oil burner: Yes
Transfer Facility: No	Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications: Yes
TSD Activity: Yes	Processor: No	
Recycler Activity: No	Refiner: Yes	
Exempt Boiler and/or Industrial Furnace	Subpart K	
Small Quantity Onsite Burner Exemption: No	College/University: No	Non-profit Research Institute: No
Smelting, Melting, Refining Furnace Exemption: No	Teaching Hospital: No	Withdrawal: No
Underground Injection Control: No		
Destination Facility for Universal Waste: No		

RCRA Site Detail

Report run on: December 16, 2011 - 5:51 PM

Page 5

Effective Date: 07/30/1997

Source Type: Notification

Seq. Number: 1

Owner/Previous Site Name: ORTEK INCORPORATED

Location 7601 W 47TH ST
Address: MC COOK, IL 60525

Mailing 7601 W 47TH ST
Address: MCCOOK, IL 60525

Contact Person FRANK LAPPIN 7601 W 47TH ST
For Source (708) 442-6000 MCCOOK, IL 60525
Information UNITED STATES

Owner (current) 7601 W 47TH ST Type: Private
ORTEK INC MCCOOK, IL 60525
From: To: Phone: (412) 856-6100

Land Type: Private Non Notifier: No TSD Date: Accessibility:

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Small Quantity Generator; State:

Other Hazardous Waste Generator Activities

Used Oil Activities

Short Term Generator:	No	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity:	No	Transporter:	Used Oil Fuel Marketer Activity	
Mixed Waste Generator:	No	Transfer Facility:	Marketer who directs shipment	
Transporter Activity:	No		off-specification used oil to	
Transfer Facility:	No	Used Oil Processor and/or	off-specification used oil burner:	Yes
TSD Activity:	Yes	Re-refiner Activity		
Recycler Activity:	No		Marketer who first claims the used	
Exempt Boiler and/or Industrial Furnace		Processor:	oil meets the specifications:	Yes
Small Quantity Onsite Burner Exemption:	No	Refiner:		
Smelting, Melting, Refining Furnace				
Exemption:	No	Subpart K		
Underground Injection Control:	No	College/University:	Non-profit Research Institute:	No
Destination Facility for Universal Waste:	No	Teaching Hospital:	Withdrawal:	No


Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D002 D008 K048 K049 K050 K051 K052

ATTACHMENT F

RS Used Oil Services' Notification

OMB# 2050-0024; Expires 11/30/2011

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input checked="" type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)		
2. Site EPA ID Number	EPA ID Number: <u>IL4R0001116714781</u>		
3. Site Name	Name: <u>RS Used Oil Services, Inc.</u>		
4. Site Location Information	Street Address: <u>7801 W. 47th St.</u> City, Town, or Village: <u>McCook</u> Country: <u>USA</u> State: <u>IL</u> Zip Code: <u>60525</u>		
5. Site Land Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. NAICS Code(s) for the Site (at least 5-digit codes)	A. <u> </u> C. <u> </u> B. <u> </u> D. <u> </u>		
7. Site Mailing Address	Street or P.O. Box: <u>25903 S. Ridgeland Ave.</u> City, Town, or Village: <u>Monroe</u> State: <u>IL</u> Country: <u>USA</u> Zip Code: <u>60449</u>		
8. Site Contact Person	First Name: <u>William</u> MI: <u>J.</u> Last: <u>Kennedy</u> Title: <u>Director of Safety & Compliance</u> Street or P.O. Box: <u>25903 S. Ridgeland Ave.</u> City, Town or Village: <u>Monroe</u> State: <u>IL</u> Country: <u>USA</u> Zip Code: <u>60449</u> Email: <u>bill@rsusedoil.com</u> Phone: <u>708-634-9300</u> Ext.: <u> </u> Fax: <u>708-634-8400</u>		
9. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: <u>North American Waste Refining</u> Date Became Owner: <u>07/04/2003</u> Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other Street or P.O. Box: <u>7801 W. 47th St.</u> Phone: <u>412-858-8100</u> City, Town, or Village: <u>McCook</u> State: <u>IL</u> Country: <u>USA</u> Zip Code: <u>60525</u> B. Name of Site's Operator: <u>Ortek, Inc.</u> Date Became Operator: <u>07/04/2003</u> Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

EPA Form 8700-12, 8700-13 A/B, 8700-23 (Revised 11/2009)

RELEASE

Page 1 of 4

NOV 03 2011

RECEIVED

EPA ID Number

OMB#: 2050-0024; Expires 11/30/2011

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ◆ You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories. See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- ☐ a. College or University
☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D008	D039				

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

ATTACHMENT G

Used Oil Waste Analysis Plan

Job's/Lab's
copy

ORTEK INC.

USED OIL MANAGEMENT WASTE ANALYSIS PLAN

Revised edition 03/15/03

ORTEK INC. WASTE ANALYSIS PLAN

The intent of this plan is to fully comply with both 40 CFR 279.55 as well as section 739.155 of the Illinois Environmental Protection Act. Under these acts our facility Ortek Inc. located at 7601 West 47th street in McCook, Illinois meets the definition of a used oil processor and as such must have a written waste analysis plan.

To comply with section 739.153 Ortek Inc. shall use both generator knowledge as well as sample analysis.

Incoming Waste Stream Analysis Plan

1. All waste streams at least annually or when their waste stream changes shall submit a copy of our waste profile sheet certifying that their waste stream is non-hazardous and meets the requirements of section 739.153 (See appendix A for waste profile sheet) 739.155(a)(1)
2. Upon entering the facility each truck and/or compartment of the truck shall be sampled using the Containerized liquid wastes method of sampling: COLIWASA described in Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods, SW-846, incorporated by reference in 35 Ill. Adm. Code 720.111. 739.155(a)(2)(A)
3. All samples from each truck or compartment of the truck shall be analyzed prior to unloading and will be done so on-site. 739.155(a)(2)(B)
4. Ortek Inc. shall use SW-846 test method 9075 as approved by the US EPA for determining chlorine and other halogens in used oil to comply with section 739.153 (See appendix B for methodology) 739.155(a)(2)(C) XRF
5. Ortek Inc. will use a combination of generator knowledge as well as sampling analysis to determine the content of halogens in the used oil we accept for reprocessing. 739.155(a)(3)

Outgoing On-Spec Used Oil Analysis Plan

Any used oil received and processed and the intended use is for energy recovery shall meet the following standards. (739.172 / 739.111)

Arsenic	5 ppm max.
Cadmium	2 ppm max.
Chromium	10 ppm max.
Lead	100 ppm max.
Flash Point	100 °F min.
Total Halogens	4,000 ppm max. ²

Footnote: ² Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under section 739.110(b)(1)

APPENDIX A

MATERIAL PROFILE SHEET

Profile # _____

A. Billing Information (Written price quotes and inquiries will be sent to this address.)

Company _____ Account # _____
 Address _____
 City/State _____ Zip _____ Contact _____
 Phone _____ Fax _____

B. Generator Information/Location of Waste

Generator Name _____ Technical Contact _____
 Premise Address _____
 City/State _____ Zip _____
 Contact Phone _____ Contact Fax _____
 Type of Business Activity _____ SIC Code _____

C. Waste Description

Common Name of Waste _____
 Process Generating Waste _____
 Other Process Information _____

Source of Waste

- ☐ Unused Product or Chemical
☐ Waste by-product from process
☐ Spill clean up
☐ Planned Site Remediation
☐ Other _____

D. Physical Properties (at 25° C or 77° F)

Physical State

- ☐ 100% Solid Without Free Liquid
☐ 100% Liquid With No Solids
☐ Liquid/solid mixture
 _____ % Free Liquid
 _____ % Settled Solids
 _____ % Total Suspended Solids

Number of Phases/Layers

- ☐ 1 ☐ 2 ☐ 3

% By Volume (Approx.)

Top Middle Bottom

Odor

- ☐ None
☐ Mild
☐ Strong
 Describe: _____

Color

- ☐ Transparent
☐ Translucent
☐ Opaque
 Describe: _____

Flash Point

- ☐ < 73° F
☐ 73° - 100° F
☐ 101° - 140° F
☐ 141° - 200° F
☐ > 200° F

pH

- ☐ < 2
☐ 2.1 - 4.9
☐ 5.1 - 9
☐ 9.1 - 12.5
☐ > 12.5

Specific Gravity (gm/ml)

- ☐ < 0.8 (e.g. Petroleum)
☐ 0.8 - 1.0 (e.g. Water/Petroleum)
☐ 1.0 (e.g. Water)
☐ 1.0 - 1.2 (e.g. Antifreeze)
☐ > 1.2 (e.g. Methylene Chloride)

Viscosity

- ☐ Low (e.g. Water)
☐ Medium (e.g. Motor Oil)
☐ High (e.g. Molasses)

E. Volume

Anticipated Volume: _____ ☐ Drums ☐ Bulk ☐ Other _____
 Generation Frequency: ☐ One Time ☐ Batch ☐ Continuous
 Estimated Shipment Frequency: ☐ Weekly ☐ Semimonthly ☐ Monthly ☐ Quarterly ☐ Other _____

F. Composition (Must add up to 100%. Include inert materials and/or debris if applicable.)

	%	%
_____	%	%
_____	%	%
_____	%	%
Total		%

G. Constituents Attach all available data including Lab analysis and MSDS'sThese values are based on ☐ knowledge ☐ testing ☐ none in this section present**INORGANIC**

RCRA Regulated Metals	Regulatory Level (mg/l)	Conc. (mg/l)	Other	Conc. (mg/l)	Pesticides/Herbicides	Regulatory Level (mg/l)	Conc. (mg/l)
D004 Arsenic	5.0	_____	Ammonia	_____	D012 Endrin	0.02	_____
D005 Barium	100.0	_____	Phosphorus	_____	D013 Lindane	0.4	_____
D006 Cadmium	1.0	_____	Formaldehyde	_____	D014 Methoxychlor	10.0	_____
D007 Chromium	5.0	_____	COD	_____	D015 Toxaphene	0.5	_____
D008 Lead	5.0	_____	Total Solids	_____	D016 2,4-D	10.0	_____
D009 Mercury	0.2	_____	PCBs	_____	D017 2,4,5-TP (Silvex)	1.0	_____
D010 Selenium	1.0	_____	Dioxins	_____	D020 Chlordane	0.03	_____
D011 Silver	5.0	_____			D031 Heptachlor (and its epoxide)	0.008	_____
OTHER METALS: Conc. (mg/l)							
Copper _____	Cobalt _____		Titanium _____				
Nickel _____	Tin _____		Vanadium _____				
Zinc _____	Molybdenum _____						

ORGANIC

Volatil Compounds	Regulatory Level (mg/l)	Conc. (mg/l)	Semi-Volatile Compounds	Regulatory Level (mg/l)	Conc. (mg/l)	Other Hazards
D018 Benzene	0.5	_____	D023 o-Cresol	200.0	_____	<input type="checkbox"/> Water Reactive
D019 Carbon Tetrachloride	0.5	_____	D024 m-Cresol	200.0	_____	<input type="checkbox"/> OSHA Regulated Carcinogens
D021 Chlorobenzene	100.0	_____	D025 p-Cresol	200.0	_____	
D022 Chloroform	6.0	_____	D026 Cresol (Total)	200.0	_____	<input type="checkbox"/> Oxidizer
D028 1,2-Dichloroethene	0.5	_____	D027 1,4-Dichlorobenzene	7.5	_____	<input type="checkbox"/> Reducer
D029 1,1-Dichloroethylene	0.7	_____	D030 2,4-Dinitrotoluene	0.13	_____	<input type="checkbox"/> Infectious
D035 Methyl Ethyl Ketone	200.0	_____	D032 Hexchlorobenzene	0.13	_____	<input type="checkbox"/> Thermally Sensitive
D039 Tetrachloroethylene	0.7	_____	D033 Hexachlorobutadiene	0.5	_____	<input type="checkbox"/> Corrosive
D040 Trichloroethylene	0.5	_____	D034 Hexachloroethane	3.0	_____	<input type="checkbox"/> Other _____
D043 Vinyl Chloride	0.2	_____	D036 Nitrobenzene	2.0	_____	
			D037 Pentachlorophenol	100.0	_____	
			D038 Pyridine	5.0	_____	
			D041 2,4,5-Trichlorophenol	400.0	_____	
			D042 2,4,6-Trichlorophenol	2.0	_____	

H. Regulatory StatusRCRA Hazardous Waste (per 40CFR261)? ☐ Yes ☐ NoState Hazardous Waste? ☐ Yes ☐ NoUSDOT Hazardous Material? ☐ Yes ☐ NoUsed Oil (per 40CFR279)? ☐ Yes ☐ No

If yes to any, describe _____

I. Sample StatusRepresentative sample has been supplied? ☐ Yes ☐ No Sampled by: _____ Date Sampled: _____**J. Generators Certification**

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples are representative of the actual waste. If Ortek Inc. discovers a discrepancy during the approval process, generator grants Ortek Inc. the authority to amend the profile as Ortek Inc. deems necessary to reflect the discrepancy.

Generator's Signature _____

Name (print) _____

Date _____

APPENDIX B

RCRA SW-846 METHODS FOR DETERMINING CHLORINE AND OTHER HALOGENS IN USED OIL

Method	Title	Description of Procedure	Analytes Detected	Sensitivity (ppm)	Notes
8021B	Halogenated Volatile Organics by GC/HECD: Capillary Column Technique	Purge-and-trap (or dilute and shoot for oils) gas chromatography (GC) procedure using a Hall Electrolytic Conductivity Detector (HECD).	Applicable to individual volatile organic compounds in oil by dilute and shoot sample introduction.	EQLs of 0.040 to 0.625 mg/L in non-water miscible waste. Very low detection limit.	Method does not provide a total chloride number. The HECD is a relatively low-cost GC detector when compared to the MS.
8260B	Volatile Organic Compounds by GC/MS: Capillary Column Technique	Purge-and-trap (or dilute and shoot for oils) gas chromatography (GC) procedure using a mass spectrometer (MS) detector.	Applicable to individual volatile organic compounds in oil by dilute and shoot sample introduction.	EQLs of about 2.5 mg/L in non-water miscible waste. Very low detection limit.	Method does not provide a total chloride number. The MS detector is an expensive, complex detector.
9020B	Total Organic Halides (TOX)	A sample of water is passed through a column of activated carbon, the column is washed to remove inorganic halides, the remaining halides are combusted, and detected with a microcoulometric detector.	Applicable to all organic halides except fluorine in drinking water or ground waters that do not contain an amount of inorganic halides in excess of 20,000 times.	MDL of 0.005 mg/L for drinking water and ground waters.	Generates a single total halide number. Method is not applicable to oil matrices.
5050	Bomb Combustion Method for Solid Waste	A sample of oil is oxidized by combustion for 30-40 minutes in a bomb containing oxygen under pressure. The resulting combustate is analyzed by Methods 9056, 9252A, or 9253.	This procedure does not detect halides or halogenated compounds. Rather, this procedure prepares oil samples for analysis by other determinative methods.	Not applicable. This is not a determinative procedure.	Applicable to solid waste, oils, fuels, and related materials.

RCRA SW-846 METHODS FOR DETERMINING CHLORINE AND OTHER HALOGENS IN USED OIL

Method	Title	Description of Procedure	Analytes Detected	Sensitivity (ppm)	Notes
9056	Anion Chromatography Method	For oils, 2-3 mL of combustate from Method 5050 is injected into an ion chromatograph and is pumped through 3 different ion exchange columns with halogens detected by a conductivity detector.	This procedure can sequentially determine chloride, fluoride, bromide, nitrate, nitrite, phosphate, and sulfate in combustate.	Minimum DL of 0.05 mg/L for F ⁻ and 0.1 mg/L for Br ⁻ , Cl ⁻ , and the other ions. Very low detection limit.	The only method that can be used to determine the conc. of each halide group (F ⁻ , Cl ⁻ , or Br ⁻).
9253	Chloride (Titrimetric, Silver Nitrate)	For oils, combustate from Method 5050 is adjusted to pH 8.3 and is titrated with silver nitrate solution in the presence of potassium chromate indicator.	This method can determine chloride from bomb combustate. Bromide, iodide, and sulfide are titrated along with the chloride.	This method is intended for oxygen bomb combustates and waters where the chloride content is 5 mg/L or more.	Bromide, iodide, and sulfide are also titrated. Ortho- and polyphosphate can interfere at concentrations above 250 and 25 mg/L, respectively.
9075	Test Method for Total Chlorine in New and Used Petroleum Products by XRF Spectrometry	A well mixed sample is loaded into an X-ray fluorescence (XRF) spectrometer. The intensities of the chlorine K alpha and sulfur K alpha lines are measured using a calibrated system. The sulfur intensity is used to correct for absorption by sulfur. Free water is a major interferant and should be removed before analysis.	This method can determine the total chlorine in new and used oils, fuels, and related materials. Possible interferants include metals, water, and sediments in the oil. Spike recovery measurements on used crankcase oil showed that diluting samples 5 to 1 allowed accurate measurement on 80% of the samples.	The applicable range of this method is from 200 mg/kg to percent levels of chlorine in oil matrices.	This method does determine total chloride concentration. One sample from each group of closely related samples should be spiked to confirm that matrix effects are not significant.

RCRA SW-846 METHODS FOR DETERMINING CHLORINE AND OTHER HALOGENS IN USED OIL

Method	Title	Description of Procedure	Analytes Detected	Sensitivity (ppm)	Notes
9076	Test Method for Total Chlorine in New and Used Petroleum Products by Oxidative Combustion and Microcoulometry	A sample is placed in a quartz boat at the inlet of a high-temperature quartz combustion tube. An inert carrier gas sweeps across the inlet while oxygen flows to the center of the combustion tube. The boat and sample are passed through a temperature zone of about 300° C to volatilize the light ends. The sample is then advanced to the center of the combustion tube, which is at 1000° C, where the chlorine is converted to chloride and oxychlorides, which then flow into an attached titration cell where they quantitatively react with silver ions. The total current required to coulometrically replace the silver ions is a measure of the chlorine present in the sample.	This method can determine total chlorine in new and used oils, fuels, and related materials. Bromine and iodine will also give a positive response. However, because oxyhalides of bromine and iodine do not react in the titration cell, only about a 50% microequivalent response is detected from them.	The applicable range of this method is from 10 to 10,000 mg/kg of chlorine in oil matrices.	This method does determine total chloride concentration along with some of the bromide and iodide concentration present.
9077	Test Method for Total Chlorine in New and Used Petroleum Products (3 Different Field Test Kit Methods)	Method A: The CHLOR-D-TECT 1000 by Dexsil Corporation, involves dispersing a sample of oil (about 0.4 g by volume) in a solvent and reacting with a mixture of metallic sodium catalyzed with naphthalene and diglyme at ambient temperature. All halides in the mixture are extracted into an aqueous buffered solution and titrated with mercuric nitrate using a diphenyl-carbazone indicator to a blue-violet endpoint.	This method can determine whether or not a sample contains greater than or less than 1000 ppm of total chloride in new and used oils, fuels and related materials. Fluoride, bromide, and iodide are also titrated and reported as chloride in the procedure.	This method is semi-quantitative. Results are reported as being above or below 1000 mg/kg of chlorine (along with bromide and iodide) in oil matrices.	This method can determine total halogens as chloride. Each sample should be tested twice. If the results do not agree then a third test must be performed.

RCRA SW-846 METHODS FOR DETERMINING CHLORINE AND OTHER HALOGENS IN USED OIL

Method	Title	Description of Procedure	Analytes Detected	Sensitivity (ppm)	Notes
9077 (cont.)		Method B: The Quanti-Chlor Kit from Chemetrics Inc., involves a reverse titration of a fixed volume of mercuric nitrate with the extracted sample to an endpoint that is denoted by a change from blue to yellow in the titration vessel.	This method can determine total chlorine in new and used oils, fuels, and related materials. Fluoride, bromide, and iodide are also titrated and reported as chloride in the procedure.	The applicable range of this method is 750 to 7000 mg/kg chlorine in oil matrices.	This method can determine total halogens as chloride. Each sample should be tested twice. If the results do not agree within 10% RPD a third test should be run.
		Method C: The CHLOR-D-TECT Q4000 from Dexsil Corporation involves a titration of the extracted sample with mercuric nitrate by means of a 1- mL microburette to an endpoint that is denoted by a change from pale yellow to red violet. The concentration of chlorine in the original oil is then read from a scale on the microburette.	This method can determine total chlorine in new and used oils, fuels, and related materials. Fluoride, bromide, and iodide are also titrated and reported as chloride in the procedure.	The applicable range of this method is 300 to 4000 mg/kg of chlorine in oil matrices.	This method can determine total halogens as chloride. Each sample should be tested twice. If the results do not agree within 10% RPD, a third test should be run.

TEST METHOD FOR TOTAL CHLORINE IN NEW AND USED PETROLEUM
PRODUCTS BY X-RAY FLUORESCENCE SPECTROMETRY (XRF)

1.0 SCOPE AND APPLICATION

1.1 This test method covers the determination of total chlorine in new and used oils, fuels, and related materials, including crankcase, hydraulic, diesel, lubricating and fuel oils, and kerosene. The chlorine content of petroleum products is often required prior to their use as a fuel.

1.2 The applicable range of this method is from 200 µg/g to percent levels.

1.3 Method 9075 is restricted to use by, or under the supervision of, analysts experienced in the operation of an X-ray fluorescence spectrometer and in the interpretation of the results.

2.0 SUMMARY OF METHOD

2.1 A well-mixed sample, contained in a disposable plastic sample cup, is loaded into an X-ray fluorescence (XRF) spectrometer. The intensities of the chlorine K α and sulfur K α lines are measured, as are the intensities of appropriate background lines. After background correction, the net intensities are used with a calibration equation to determine the chlorine content. The sulfur intensity is used to correct for absorption by sulfur.

3.0 INTERFERENCES

3.1 Possible interferences include metals, water, and sediment in the oil. Results of spike recovery measurements and measurements on diluted samples can be used to check for interferences.

Each sample, or one sample from a group of closely related samples, should be spiked to confirm that matrix effects are not significant. Dilution of samples that may contain water or sediment can produce incorrect results, so dilution should be undertaken with caution and checked by spiking. Sulfur interferes with the chlorine determination, but a correction is made.

Spike recovery measurements of used crankcase oil showed that diluting samples five to one allowed accurate measurements on approximately 80% of the samples. The other 20% of the samples were not accurately analyzed by XRF.

3.2 Water in samples absorbs X-rays emitted by chlorine. For this interference, use of as short an X-ray counting time as possible is beneficial. This appears to be related to stratification of samples into aqueous and nonaqueous layers while in the analyzer.

Although a correction for water may be possible, none is currently available. In general, the presence of any free water as a separate phase or a water content greater than 25% will reduce the chlorine signal by 50 to 90%. See Sec. 6.4.

4.0 APPARATUS AND MATERIALS

4.1 XRF spectrometer, either energy dispersive or wavelength dispersive. The instrument must be able to accurately resolve and measure the intensity of the chlorine and sulfur lines with acceptable precision.

4.2 Disposable sample cups with suitable plastic film such as Mylar®.

5.0 REAGENTS

5.1 Purity of reagents. Reagent-grade chemicals shall be used in all tests. Unless otherwise indicated, it is intended that all reagents shall conform to the specifications of the Committee on Analytical Reagents of the American Chemical Society, where such specifications are available. Other grades may be used, provided it is first ascertained that the reagent is of sufficiently high purity to permit its use without lessening the accuracy of the determination.

5.2 Mineral oil, mineral spirits or paraffin oil (sulfur- and chlorine-free), for preparing standards and dilutions.

5.3 1-Chlorodecane (Aldrich Chemical Co.), 20.1% chlorine, or similar chlorine compound.

5.4 Di-n-butyl sulfide (Aldrich Chemical Co.), 21.9% sulfur by weight.

5.5 Quality control standards such as the standard reference materials NBS 1620, 1621, 1622, 1623, and 1624 for sulfur in oil standards; and NBS 1818 for chlorine in oil standards.

6.0 SAMPLE COLLECTION, PRESERVATION, AND HANDLING

6.1 All samples must be collected using a sampling plan that addresses the considerations discussed in Chapter Nine.

6.2 The collected sample should be kept headspace free prior to preparation and analysis to minimize volatilization losses of organic halogens. Because waste oils may contain toxic and/or carcinogenic substances, appropriate field and laboratory safety procedures should be followed.

6.3 Laboratory sampling of the sample should be performed on a well-mixed sample of oil. The mixing should be kept to a minimum and carried out as nearly headspace free as possible to minimize volatilization losses of organic halogens.

6.4 Free water, as a separate phase, should be removed and cannot be analyzed by this method.

7.0 PROCEDURE

7.1 Calibration and standardization.

7.1.1 Prepare primary calibration standards by diluting the chlorodecane and n-butyl sulfide with mineral spirits or similar material.

7.1.2 Prepare working calibration standards that contain sulfur, chlorine, or both according to the following table:

Cl: 500, 1,000, 2,000, 4,000, and 6,000 µg/g
S: 0.5, 1.0, and 1.5% sulfur

- | | |
|--------------------------|--------------------------|
| 1. 0.5% S, 1,000 µg/g Cl | 5. 1.0% S, 6,000 µg/g Cl |
| 2. 0.5% S, 4,000 µg/g Cl | 6. 1.5% S, 1,000 µg/g Cl |
| 3. 1.0% S, 500 µg/g Cl | 7. 1.5% S, 4,000 µg/g Cl |
| 4. 1.0% S, 2,000 µg/g Cl | 8. 1.5% S, 6,000 µg/g Cl |

Once the correction factor for sulfur interference with chlorine is determined, fewer standards may be required.

7.1.3 Measure the intensity of the chlorine K α line and the sulfur K α line as well as the intensity of a suitably chosen background. Based on counting statistics, the relative standard deviation of each peak measurement should be 1% or less.

7.1.4 Determine the net chlorine and sulfur intensities by correcting each peak for background. Do this for all of the calibration standards as well as for a paraffin blank.

7.1.5 Obtain a linear calibration curve for sulfur by performing a least squares fit of the net sulfur intensity to the standard concentrations, including the blank. The chlorine content of a standard should have little effect on the net sulfur intensity.

7.1.6 The calibration equation for chlorine must include a correction term for the sulfur concentration. A suitable equation follows:

$$Cl = (mI + b) (1 + k*S) \quad (1)$$

where:

I = net chlorine intensity
m, b, k* = adjustable parameters
S = sulfur concentration

Using a least squares procedure, the above equation or a suitable substitute should be fitted to the data. Many XRF instruments are equipped with suitable computer programs to perform this fit. In any case, the resulting equation should be shown to be accurate by analysis of suitable standard materials.

7.2 Analysis.

7.2.1 Prepare a calibration curve as described in Sec. 7.1. By periodically measuring a very stable sample containing both sulfur and chlorine, it may be possible to use the calibration equations for more than 1 day. During each day, the suitability of the calibration curve should be checked by analyzing standards.

7.2.2 Determine the net chlorine and sulfur intensities for a sample in the same manner as done for the standards.

7.2.3 Determine the chlorine and sulfur concentrations of the samples from the calibration equations. If the sample concentration for either element is beyond the range of the standards, the sample should be diluted with mineral oil and reanalyzed.

8.0 QUALITY CONTROL

8.1 Refer to Chapter One for specific quality control procedures.

8.2 One sample in ten should be analyzed in triplicate and the relative standard deviation reported. For each triplicate, a separate preparation should be made, starting from the original sample.

8.3 Each sample, or one sample in ten from a group of similar samples, should be spiked with the elements of interest by adding a known amount of chlorine or sulfur to the sample. The spiked amount should be between 50% and 200% of the sample concentration, but the minimum addition should be at least five times the limit of detection. The percent recovery should be reported and should be between 80% and 120%. Any sample suspected of containing >25% water should also be spiked with organic chlorine.

8.4 Quality control standard check samples should be analyzed every day and should agree within 10% of the expected value of the standard.

9.0 METHOD PERFORMANCE

9.1 These data are based on 47 data points obtained by seven laboratories who each analyzed four used crankcase oils and three fuel oil blends with crankcase in duplicate. A data point represents one duplicate analysis of a sample. Two data points were determined to be outliers and are not included in these results.

9.2 Precision. The precision of the method as determined by the statistical examination of interlaboratory test results is as follows:

Repeatability - The difference between successive results obtained by the same operator with the same apparatus under constant operating conditions on identical test material would exceed, in the long run, in the normal and correct operation of the test method, the following values only in 1 case in 20 (see Table 1):

$$\text{Repeatability} = 5.72 \sqrt{x}$$

*where x is the average of two results in $\mu\text{g/g}$.

Reproducibility - The difference between two single and independent results obtained by different operators working in different laboratories on identical test material would exceed, in the long run, the following values only in 1 case in 20:

$$\text{Reproducibility} = 9.83 \sqrt{x}$$

*where x is the average value of two results in $\mu\text{g/g}$.

9.3 Bias. The bias of this test method varies with concentration, as shown in Table 2:

$$\text{Bias} = \text{Amount found} - \text{Amount expected.}$$

10.0 REFERENCE

1. Gaskill, A.; Estes, E.D.; Hardison, D.L.; and Myers, L.E. Validation of Methods for Determining Chlorine in Used Oils and Oil Fuels. Prepared for U.S. Environmental Protection Agency, Office of Solid Waste. EPA Contract No. 68-01-7075, WA 80. July 1988.
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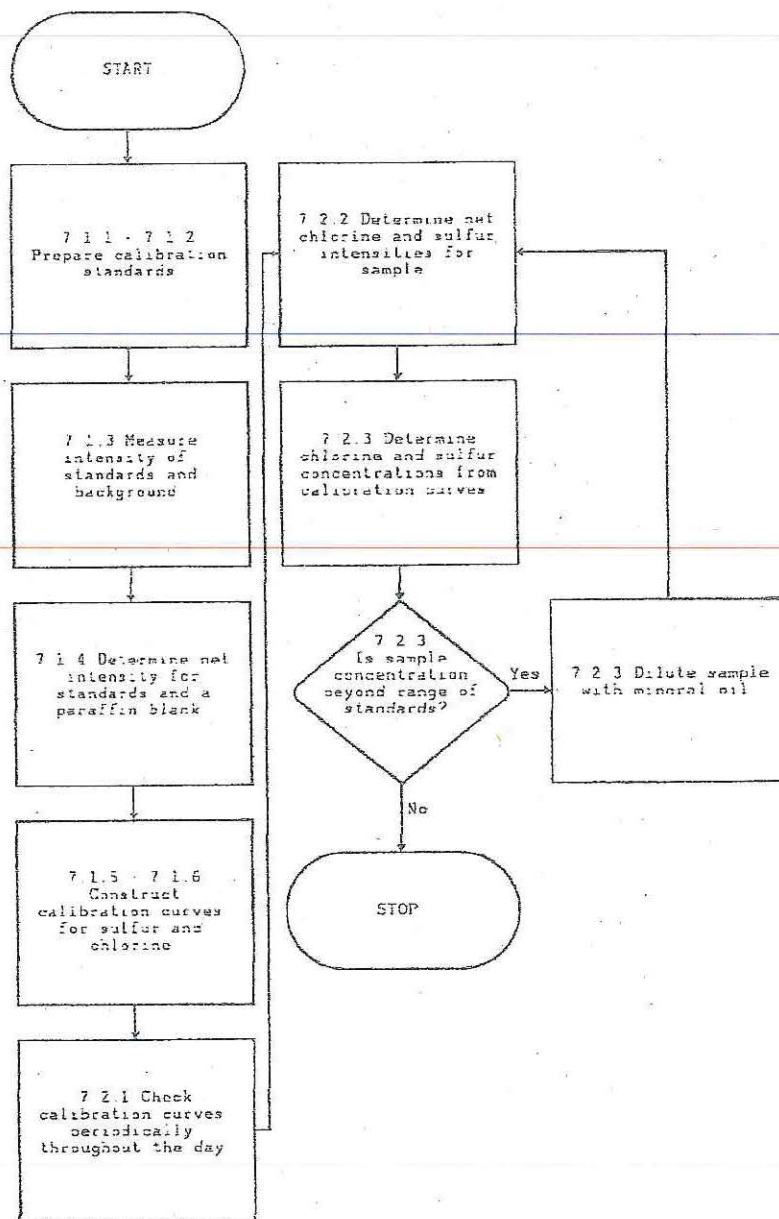
TABLE 1. REPEATABILITY AND REPRODUCIBILITY
FOR CHLORINE IN USED OILS BY
X-RAY FLUORESCENCE SPECTROMETRY

Average value, $\mu\text{g/g}$	Repeatability, $\mu\text{g/g}$	Reproducibility, $\mu\text{g/g}$
500	128	220
1,000	181	311
1,500	222	381
2,000	256	440
2,500	286	492
3,000	313	538

TABLE 2. RECOVERY AND BIAS DATA FOR CHLORINE IN
USED OILS BY X-RAY FLUORESCENCE SPECTROMETRY

Amount expected, $\mu\text{g/g}$	Amount found, $\mu\text{g/g}$	Bias, $\mu\text{g/g}$	Percent bias
320	278	-42	-13
480	461	-19	-4
920	879	-41	-4
1,498	1,414	-84	-6
1,527	1,299	-228	-15
3,029	2,806	-223	-7
3,045	2,811	-234	-8

METHOD 9075
TEST METHOD FOR TOTAL CHLORINE IN NEW AND USED
PETROLEUM PRODUCTS BY X-RAY FLUORESCENCE SPECTROMETRY (XRF)



METHOD 1010
PENSKY-MARTENS CLOSED-CUP METHOD FOR DETERMINING IGNITABILITY

1.0 SCOPE AND APPLICATION

1.1 Method 1010 uses the Pensky-Martens closed-cup tester to determine the flash point of liquids including those that tend to form a surface film under test conditions. Liquids containing non-filterable, suspended solids shall also be tested using this method.

2.0 SUMMARY OF METHOD

2.1 The sample is heated at a slow, constant rate with continual stirring. A small flame is directed into the cup at regular intervals with simultaneous interruption of stirring. The flash point is the lowest temperature at which application of the test flame ignites the vapor above the sample.

For further information on how to conduct a test by this method, see Reference 1 below.

3.0 METHOD PERFORMANCE

3.1 The Pensky-Martens and Setaflash Closed Testers were evaluated using five industrial waste mixtures and p-xylene. The results of this study are shown below in °F along with other data.

<u>Sample</u>	<u>Pensky-Martens</u>	<u>Setaflash</u>
1 ²	143.7 ± 1.5	139.3 ± 2.1
2 ²	144.7 ± 4.5	129.7 ± 0.6
3 ²	93.7 ± 1.5	97.7 ± 1.2
4 ²	198.0 ± 4.0	185.3 ± 0.6
5 ²	119.3 ± 3.1	122.7 ± 2.5
p-xylene ²	81.3 ± 1.1	79.3 ± 0.6
p-xylene ³	77.7 ± 0.5 ^a	--
Tanker oil	125, 135	--
Tanker oil	180, 180	--
Tanker oil	110, 110	--
DIBK/xylene	102 ± 4 ^b	107

^a75/25 v/v analyzed by four laboratories.

^b12 determinations over five-day period.

4.0 REFERENCES

1. D 93-80, Test Methods for Flash Point by Pensky-Martens Closed Tester, American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103, 04.09, 1986.
2. Umana, M., Gutknecht, W., Salmons, C., et al., Evaluation of Ignitability Methods (Liquids), EPA/600/S4-85/053, 1985.
3. Gaskill, A., Compilation and Evaluation of RCRA Method Performance Data, Work Assignment No. 2, EPA Contract No. 68-01-7075, September 1986.

METHOD 9041A

pH PAPER METHOD

1.0 SCOPE AND APPLICATION

1.1 Method 9041 may be used to measure pH as an alternative to Method 9040 (except as noted in Step 1.3) or in cases where pH measurements by Method 9040 are not possible.

1.2 Method 9041 is not applicable to wastes that contain components that may mask or alter the pH paper color change.

1.3 pH paper is not considered to be as accurate a form of pH measurement as pH meters. For this reason, pH measurements taken with Method 9041 cannot be used to define a waste as corrosive or noncorrosive (see RCRA regulations 40 CFR §261.22(a)(1)).

2.0 SUMMARY OF METHOD

2.1 The approximate pH of the waste is determined with wide-range pH paper. Then a more accurate pH determination is made using "narrow-range" pH paper whose accuracy has been determined (1) using a series of buffers or (2) by comparison with a calibrated pH meter.

3.0 INTERFERENCES

3.1 Certain wastes may inhibit or mask changes in the pH paper. This interference can be determined by adding small amounts of acid or base to a small aliquot of the waste and observing whether the pH paper undergoes the appropriate changes.

CAUTION: THE ADDITION OF ACID OR BASE TO WASTES MAY RESULT IN VIOLENT REACTIONS OR THE GENERATION OF TOXIC FUMES (e.g., hydrogen cyanide). Thus, a decision to take this step requires some knowledge of the waste. See Step 7.3.3 for additional precautions.

4.0 APPARATUS AND MATERIALS

4.1 Wide-range pH paper.

4.2 Narrow-range pH paper: With a distinct color change for every 0.5 pH unit (e.g., Alkaacid Full-Range pH Kit, Fisher Scientific or equivalent). Each batch of narrow-range pH paper must be calibrated versus certified pH buffers or by comparison with a pH meter which has been calibrated with certified pH buffers. If the incremental reading of the narrow-range pH paper is within 0.5 pH units, then the agreement between the buffer or the calibrated pH meter with the paper must be within 0.5 pH units.

4.3 pH Meter (optional).

5.0 REAGENTS

5.1 Certified pH buffers: To be used for calibrating the pH paper or for calibrating the pH meter that will be used subsequently to calibrate the pH paper.

5.2 Dilute acid (e.g., 1:4 HCl).

5.3 Dilute base (e.g., 0.1 N NaOH).

6.0 SAMPLE COLLECTION, PRESERVATION, AND HANDLING

6.1 All samples must be collected using a sampling plan which addresses the considerations discussed in Chapter Nine of this manual.

7.0 PROCEDURE

7.1 A representative aliquot of the waste must be tested with wide-range pH paper to determine the approximate pH.

7.2 The appropriate narrow-range pH paper is chosen and the pH of a second aliquot of the waste is determined. This measurement should be performed in duplicate.

7.3 Identification of interference:

7.3.1 Take a third aliquot of the waste, approximately 2 mL in volume, and add acid dropwise until a pH change is observed. Note the color change.

7.3.2 Add base dropwise to a fourth aliquot and note the color change. (Wastes that have a buffering capacity may require additional acid or base to result in a measurable pH change.)

7.3.3 The observation of the appropriate color change is a strong indication that no interferences have occurred.

CAUTION ADDITION OF ACID OR BASE TO SAMPLES MAY RESULT IN VIOLENT REACTIONS OR THE GENERATION OF TOXIC FUMES. PRECAUTIONS MUST BE TAKEN. THE ANALYST SHOULD PERFORM THESE TESTS IN A WELL-VENTILATED HOOD WHEN DEALING WITH UNKNOWN SAMPLES.

8.0 QUALITY CONTROL

8.1 All quality control data must be maintained and available for easy reference or inspection.

8.2 All pH determinations must be performed in duplicate.

8.3 Each batch of pH paper must be calibrated versus certified pH buffers or a pH meter which has been calibrated with certified pH buffers.

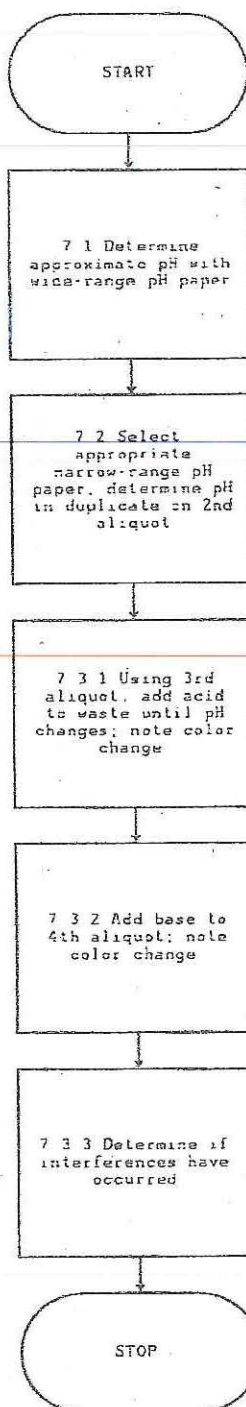
9.0 METHOD PERFORMANCE

9.1 No data provided.

10.0 REFERENCES

10.1 None required.

METHOD 9041A
pH PAPER METHOD



ATTACHMENT H

SPCC Plan

BK
copy

SPILL PREVENTION, CONTROL AND COUNTERMEASURES PLAN SPCC

**Ortek, Inc.
7601 W. 47th Street
McCook, IL 60525
708-762-5117**

SPILL PREVENTION, CONTROL AND COUNTERMEASURES (SPCC) PLAN

Ortek Inc. 7601 West 47th Street McCook, IL 60525

Date of Facility's First Plan: June 14, 2002
Date of Last Plan Amendment: October, 2007
Date of Last Plan Review: August, 2010

Designated staff person(s) responsible for spill prevention: Robert Kolar

EMERGENCY TELEPHONE NUMBERS:

Notification Contacts:

- | | | |
|---|-------------------|----------------|
| 1. Facility Manager, Robert Kolar | (cell) | Non-responsive |
| | (home) | Non-responsive |
| 2. National Response Center | | (800) 424-8802 |
| 3. Illinois Emergency Services & Disaster Agency (ESDA) | | (800) 782-7860 |
| 4. Illinois EPA (Bureau of Land), general phone number | | (217) 782-6761 |
| 5. Cook County Department of Environmental Control | | (312) 603-8200 |
| 6. Village of McCook dial 911 for Fire Department or Police | | (708) 447-1234 |
| 7. Other Ortek Employees, Laurie Witter | (cell) | Non-responsive |
| | (home) | Non-responsive |
| 8. Hospitals -- | LaGrange Memorial | (708) 352-1200 |
| | MacNeal Hospital | (708) 783-9100 |

Clean-Up Contractors:

- | | |
|---|----------------|
| 1. Future Environmental (contacts = Jim, Steve, Tom) | (708) 479-6900 |
| 2. North Branch Environmental (contacts = John or JD) | (630) 529-0240 |
| 3. HazChem Environmental (contacts = Al or Chris) | (630) 458-1910 |
| 4. Duke's Oil (contact = Gary) | (630) 860-5689 |

Supplies and Equipment:

- | | |
|--|----------------|
| 1. North Branch Environmental | (630) 529-0240 |
| 2. or any of the other clean-up contractors listed above | |

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ATTACHMENTS:

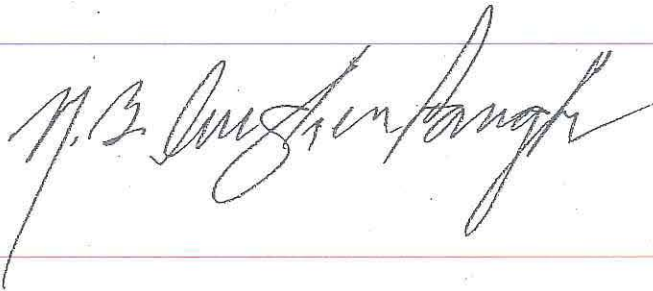
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PROFESSIONAL ENGINEER CERTIFICATION

CERTIFICATION: I hereby certify that I and/or those under my direction have examined the facility and having reviewed this SPPC Plan, attest that the Plan has been prepared in accordance with good engineering practices.

Engineer: Nolan Aughenbaugh Registration Number: 062-047575 State: Illinois

Signature: Nolan Aughenbaugh Date of Plan Certification: October 25, 2007



SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN MANAGEMENT APPROVAL

I hereby certify that the necessary resources to implement this Plan have been committed.

Lowell Aughenbaugh

Lowell Aughenbaugh, Facility Manager

6-14-02
& 10-24-07

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

Please see Attachment A.

PROFESSIONAL ENGINEER CERTIFICATION

CERTIFICATION: I hereby certify that I and/or those under my direction have examined the facility and having reviewed this SPPC Plan, attest that the Plan has been prepared in accordance with good engineering practices.

Engineer: Nolan Aughenbaugh Registration Number: 062-047575 State: Illinois

Signature: Nolan Aughenbaugh Date of Plan Certification: October 25, 2007

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN MANAGEMENT APPROVAL

I hereby certify that the necessary resources to implement this Plan have been committed.

Lowell Aughenbaugh

Lowell Aughenbaugh, Facility Manager

6-14-02
& 10-24-07

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

Please see Attachment A.

**SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN
COMPLIANCE REVIEW PAGE**

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every three years. These reviews and evaluations are recorded below:

Reviewer (signature) Reviewer (print) Date Comments Is P.E. re-certification required?

Yes or No

1.	Bob Madl \ Lowell Aughenbaugh	6-14-02		yes
2.	Lowell Aughenbaugh	6-03-03		no
3.	Lowell Aughenbaugh	June, 2005		
4.	Lowell Aughenbaugh / Nolan Aughenbaugh	Oct, 2007		

FACILITY INFORMATION

Name: Ortek Inc.

Mailing Address: 7601 West 47th Street
McCook, IL 60525

Street Address: 7601 West 47th Street
McCook, IL 60525

Owner: North American Refining Corp.
7601 West 47th Street
McCook, IL 60525

Facility Contact: Lowell Aughenbaugh
(708) 762-5117

Location: Approximately 1.0 miles north of Interstate I-55 off Harlem Ave. (I-55 Exit 283) then Left (west) on 47th Street. The Site is located in Cook County, Illinois

Facility Description: Ortek Inc. is an oily waste water treatment facility, used oil recycler (re-refiner), compounder/blender, and packager. The site comprises of approximately 6-acres which is bermed/contained on all sides. The Company owns and operates various equipment including forklifts, backhoes, a crane, man-lift, bobcat (skidsteer), loading docks, truck scale, storage tanks, process equipment, and high & low pressure boilers.

Fixed Storage: All the storage tanks at the Ortek site are aboveground storage tanks (AST's). A listing of these tanks and related specific information are contained in Appendix C (Storage Tank Data).

Total liquid storage capacity: 2,531,870 gallons

Attachment B, contains a facility Plan Map showing the location of storage tanks, process equipment, and the general layout of the facility.

PAST SPILL EXPERIENCE – 40 CFR 112.7 (a)

<u>Description of Spill</u>	<u>Corrective Actions Taken</u>	<u>Plan for Preventing Recurrence</u>
1987 tank pressure release sulfurized lard tank	Area cleaned up / remediated	Personnel training & press safety release installed on process tank

POTENTIAL EQUIPMENT FAILURES – 40 CFR 112.7 (b)

<u>Potential Failure</u>	<u>Spill Direction</u>	<u>Volume Released</u>	<u>Spill Rate</u>
Complete failure of a full tank	Inside Dike Area	Est. 50,000 gallons	Instantaneous Assuming worst case
Partial failure of a full tank	Inside Dike Area	up to 5,000 gallons	Gradual to Instantaneous
Storage Tank, or Tanker overfill, supervised	Inside Dike Area	up to 1,000 gallons	assume 100 gallons / min
Pipe failure	Inside Dike Area Or un-diked area	up to say 1000 gals	assume 100 gallons / min
Small Leak in pipe, flange, valve, or packing	Inside Dike Area Or pump house	up to 100 gallons	Gradual
Tank truck leak or failure	Truck offloading areas	up to 5000 gallons	Gradual to Instantaneous
Hose leak during transfer	Northbound down RR tracks	up to 500 gallons	assume 100 gals / minute
Pump rupture or failure	Pump house or Diked area	up to 500 gallons	assume 100 gals / minute

CONTAINMENT AND DIVERSIONARY STRUCTURES – 40 CFR 112.7 (c)(1)

- i. Dikes are provided around the tanks that store various lubricating oils/additives, and other materials across the facility. The floor and walls of the containment structures are concrete, or clay earthened dikes. Spills within any containment area are expected to be contained in that area. In addition to tank storage areas being contained, the entire 6-acre Ortek facility is “contained”, forming a secondary, backup containment. Earthen and/or concrete berms/walls surround the entire site, with native clay forming the native soil base of the facility. Consultants during the 1970’s completed surveying and volume calculations and established that the site as it lays could contain over 4-million gallons of liquid(s) before any spilled material could leave the site.
- ii. The loading and unloading area for tanker trucks and/or railcars is also made of concrete/asphalt. However some loading of product materials is completed over unprotected gravel areas. The use of readily available spill equipment would prevent any potential spills from spreading far including Ortek’s liquid vacuum truck, backhoe, and other resources available to the company.
- iii. The facility operates its own wastewater treatment plant and all drainage of rainwater within the facility flows thru the treatment plant. In addition, there are no sewers located within the facilities boundaries.
- iv. Ortek keeps on-hand various absorbent spill pads, absorbent clays, oil booms, numerous portable liquid pumps, vacuum truck, backhoe, case brand skidsteer (bobcat), and other such equipment should a spill ever occur. In addition, most dikes located at this site contain pumps inside each dike that are capable of pumping any spills that may occur within that dike. Ortek works with most of Chicago-Land’s top spill response contractors, and as a result generally have these trucks/emergency equipment available to us as well.

DEMONSTRATION OF PRACTICABILITY – 40 CFR 112.7(d)

Ortek Inc. has determined that use of the containment and diversionary structures and the use of readily available spill equipment to prevent discharged oil or other materials/liquids from reaching navigable waterways or sewers are practical and effective at this facility. Probably one of the best demonstrations of this at this site has been past heavy rain events (floods). During flooding events Ortek has been able to evaluate the path spills may take as well as the effectiveness of dikes, containment structures, berms, and/or diversionary structures. Because Ortek treats all it’s rainwater, we are in-effect practicing spill procedures every time it rains (although I don’t believe we have recorded all this in our spill “training” records).

FACILITY DRAINAGE – 40 CFR 112.7(e)(1)

- i. Spills from above ground storage tanks will be restrained by secondary containment. Spills outside of the dike area will be contained by the use of the facilities spill equipment.
- ii. Rainwater and/or melting snow is sent to Ortek’s own on-site waste water treatment plant.

BULK STORAGE TANKS – 40 CFR 112.7(e)(2)

- i. All of the AST's are of Underwriter Laboratories UL-142 construction and/or API 650 and are compatible with the oil or liquid that they contain and the temperature and pressure conditions of storage.
 - ii. Secondary containment volume is greater than 110 percent of the largest tank in the facility.
 - iii. 55 gallon drums containing lubricating oil additives or other materials are stored in few common areas and periodically monitored for any signs of leaks.
-
- iv. There are no underground storage tanks (UST's) at the Site.
 - v. Thickness testing has historically been completed on AST's every five years using a system of non-destructive testing such as ultrasonic or x-ray. Visual inspections of tanks and dikes are performed daily.
-
- vi. Each storage tank (AST) is equipped with a floating level style level gauge. Venting capacity is suitable for the anticipated fill and withdrawal rates. Tank level gauges are checked for accuracy whenever metering product through tested positive displacement meters, and/or measured and marked off on the tank knowing the volume per foot (gallons per foot), for any diameter tank.
 - vii. Oil leaks that result in a loss of oils from tanks, gaskets, packing, or other sources are generally corrected immediately, with spill pans or a bucket placed under the leak, for example, until the leak can be repaired.

TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESSES – 40 CFR 112.7(e)(3)

- i. There is no buried/underground piping in the facility. All piping is above grade.
- ii. Pipelines not in service or on standby for an extended period (over 3 months) are capped or blank flanged.
- iii. Pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction.
- iv. Aboveground pipelines, pumps and valves are examined daily to assess their condition. Clearing a pipeline, along with air pressure testing of the piping can be conducted if any piping section is questioned.
- v. Aboveground pipelines do not come in contact with truck or railcar loading/unloading operations.

TANK CAR AND TRUCK LOADING / UNLOADING RACKS – 40 CFR 112.7(e)(4)

- i. The tank truck loading and unloading procedures meet the minimum requirements of the U. S. Department of Transportation.
- ii. Parking brakes on trucks/railcars are set prior to loading/unloading. We request that all running tanker trucks engines are shut down during these operations.
- iii. The lower-most drain and other outlets on each tank trucks/railcar are inspected for leaks prior to and while loading and prior to departure. In addition, the internal safety valves are checked on tank trucks prior to loading and while sampling.
- iv. Deliveries and transfers are performed by qualified/trained Ortek Inc. employees.

INSPECTION AND RECORDS – 40 CFR 112.7(e)(8)

Daily visual inspections consist of a complete walk-through of the facility to check the following: piping, equipment and tanks for leakage, concrete\ground for staining and/or discoloring. In addition, tank inventory is taken on all tanks once per working day.

The checklist provided in Attachment D is followed during weekly inspections. These items covered in the inspections are performed in accordance with written procedures such as API standards and with good engineering practices.

SECURITY – 40 CFR 112.7(e)(9)

Ortek Inc. is manned twenty-four hours per day seven days per week. In addition, doors, entrance gates, etcetera are locked and secured during off hours. The facility is generally surrounded by six-foot high fencing at the property boundaries.

- i. Valves are closed after each operation at the facility. All pumps are shut off after each operation. There are generally multiple valves on each loading/unloading line so overlooking one valve should not lead to any spills. In addition, sample valves on storage tanks are capped.
- ii. The plant is illuminated twenty-four hours per day, and warning signs are posted informing visitors or others that they must check in, or not trespass. In addition, 24-hour, round the clock video surveillance is now recorded for a large portion of the facility.

PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES-40CFR 112.7 (e)(10)

- i. Facility personnel have been instructed by management in the operation and maintenance of pollution prevention equipment and pollution control laws and regulations.
- ii. Facility manager, Lowell Aughenbaugh is ultimately responsible for oil spill prevention at this facility. Mr. Bob Kolar also works in this capacity.
- iii. Yearly spill prevention briefings are provided by Management for operating personnel to ensure adequate understanding of the SPCC plan. These briefings highlight any past spill events or failures and recently developed precautionary measures. Training includes oil spill prevention, containment, and retrieval methods. A simulation of an on-site vehicular spill has been conducted and future exercises shall be periodically held to prepare for possible spill responses. Also, as discussed earlier, rain events have been useful learning/training experience, as rain accumulation and runoff is evaluated as if the rainwater had been a "spill". New employees are trained concerning the SPCC plan, generally within 2 weeks of starting work.

Instructions and phone numbers regarding the reporting of a spill to the National Response Center and the state are listed on the cover page of this plan and have been posted.

Attachment A

**CERTIFICATION OF THE APPLICABILITY
OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST**

FACILITY NAME: Ortek Inc.

FACILITY ADDRESS: 7601 W. 47th Street
McCook, IL 60525

1. Does the facility transfer oil over water or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes _____ No X
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes _____ No X
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.
Yes _____ No X
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?
Yes _____ No X
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes _____ No X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Lowell Aughenbaugh
Name (please type or print)

Signature

Facility Manager
Title

Date

¹If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

²For the purposes of 40 CFR part 112, public drinking water intakes are analogous to the public water systems as described at 40 CFR 143.2©. (from 40 CFR 112 Appendix C, Attachment C-II)



Appendix C



ORTEK STORAGE TANKS & PROCESS EQUIPMENT - CURRENT										
TANK NUMBER	PRODUCT STORED	CAPACITY	YEAR BUILT	DIAMETER	HEIGHT	STATUS	MFG.	S.N.#	gal/in	gal/ft
D-1	NOT IN SERVICE	15,000	1974	12.00	17.75	SAME			70	850
D-2	NOT IN SERVICE	15,000	1977	12.00	17.75	SAME	IMPERIAL	9831	70	850
1	OILY WASTE EMULSIONS	15,000	1976	12.00	17.75	SAME	IMPERIAL	9831	70	850
2	OILY WASTE EMULSIONS	15,000	1976	12.00	17.75	SAME			70	850
3	OILY WASTE EMULSIONS	15,000	1976	12.00	17.75	SAME	BACON		70	850
4	OILY WASTE EMULSIONS	21,300	1962	11.00	30.00	SAME			58	700
5	OILY WASTE EMULSIONS	21,300	1962	11.00	30.00	SAME			58	700
6	OILY WASTE EMULSIONS	21,300	1962	11.00	30.00	SAME			58	700
7	#5 FUEL OIL - WET	28,770	1978	11.83	35.00	CHANGE			58	825
8	NOT IN SERVICE	28,770	1978	11.83	35.00	CHANGE			58	825
9	NOT IN SERVICE	28,770	1978	11.83	35.00	CHANGE			58	825
10	NOT IN SERVICE	28,770	1978	11.83	35.00	SCRAP			58	825
20	NOT IN SERVICE	8,000	1972	13.60	16.3	empty			91	1080
98	NOT IN SERVICE	21,300	1969	11.00	30.00	CHANGE			58	700
99	NOT IN SERVICE	21,300	1969	11.00	30.00	CHANGE			58	700
100	NOT IN SERVICE	250,000	1954	35.00	98.00	CHANGE			600	7200
101	NOT IN SERVICE	250,000	1954	35.00	98.00	SCRAP	GRAVER	1092	600	7200
110	NOT IN SERVICE	15,000	1964	10.50	23.20	UNKNOWN			54	650
120	#5 FUEL OIL - WET	21,300	1952	11.00	30.00	SAME			58	700
121	#5 FUEL OIL - WET	21,300	1952	11.00	30.00	SAME			58	700
122	#5 FUEL OIL - DRY	21,300	1952	11.00	30.00	SAME			58	700
123	USED OIL	21,300	1952	11.00	30.00	CHANGE			58	700
124	USED OIL	21,300	1952	11.00	30.00	CHANGE			58	700
125	USED OIL	21,300	1952	11.00	30.00	CHANGE			58	700
126	USED OIL	21,300	1952	11.00	30.00	CHANGE			58	700
127	USED OIL	21,300	1952	11.00	30.00	CHANGE			58	700
128	WATER SOLUBLE	21,300	1952	11.00	30.00	SAME			58	700
129	WATER SOLUBLE	21,300	1952	11.00	30.00	SAME			58	700
130	USED OIL	21,300	1952	11.00	30.00	SAME			58	700
131	USED OIL	21,300	1952	11.00	30.00	SAME			58	700
132	USED OIL	21,300	1952	11.00	30.00	SAME			58	700
133	USED OIL	21,300	1952	11.00	30.00	SAME			58	700
143	NOT IN SERVICE	21,300	1969	11.00	30.00	CHANGE	IMPERIAL	7428	58	700
144	NOT IN SERVICE	21,300	1969	11.00	30.00	CHANGE	IMPERIAL	7428	58	700
145	#5 FUEL OIL - WET	21,300	1969	11.00	30.00	CHANGE	IMPERIAL	7549	58	700
146	#5 FUEL OIL - DRY	21,300	1969	11.00	30.00	SAME	IMPERIAL	7549	58	700
201	FLUSHING OIL	1,500	1962	5.00	10.20	SAME			12	147
204	NOT IN SERVICE	2,100	1958	4.70	16.00	UNKNOWN			11	130
205	NOT IN SERVICE	2,100	1958	4.70	16.00	UNKNOWN			11	130
207	SJR 2000	2,750	1958	5.75	14.00	SAME			16	194
208	SJR 2000	2,750	1958	5.75	14.00	UNKNOWN			16	194
210	SJR 2000	2,750	1958	5.75	14.00	SAME			16	194
211	H CAL 2400	2,750	1958	5.75	14.00	SAME			16	194
212	H CAL 2400	2,750	1958	5.75	14.00	SAME			16	194
213	ELCO 102 BLEND	2,750	1958	5.75	14.00	SAME			16	194
214	NIS	2,750	1958	5.75	14.00	SAME			16	194
215	EXXON 80 NEUTRAL	2,750	1958	5.75	14.00	UNKNOWN			16	194
216	ELCO 102 BLEND	2,750	1958	5.75	14.00	SAME			16	194
217	RIGID DARK TANK	2,750	1958	5.75	14.00	UNKNOWN			16	194
237	INFINEUM 4540	6,200	1962	8.00	16.48	SAME			31.5	376
238	IPC 1500	6,200	1962	8.00	16.48	SAME			31.5	376
240	SK 150 NEUTRAL	19,900	1962	11.00	27.20	CHANGE			58	700
241	ORTEK BASE OIL-150	10,500	1962	11.00	15.00	SAME			58	700
242	INFINEUM SL P 5066	12,000	1962	11.00	17.00	SAME			58	700
250	BLENDING TANK	7,500	1962	8.450	17.87	SAME	GRAVER	46309	35	420
251	BRANNEN SJ	5,200	1962	8.000	16.48	SAME			31.5	376
252	IPC 1500	10,500	1962	11.00	15.00	SAME			58	700

ATTACHMENT I

Release Information 7/14/10



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

Incident Inquiry Letter

July 28, 2010

Mr. Robert Kolar
Ortec Inc.
7601 W 47th St
McCook, IL 60525

Re: IEMA Incident 20100795/20100797, McCook, Cook County, Illinois

Dear Mr. Kolar,

On July 24, 2010, this office received information that you and/or an organization that you represent were involved in an environmental incident, which occurred at or near 7601 W 47th St on or before July 24, 2010. Our records currently indicate the involvement of 1,000 gallons of motor oil.

The Illinois Environmental Protection Agency (IEPA) is sending this Incident Inquiry Letter to request further information about the facts and circumstances related to the above referenced incident, pursuant to Section 4(h) of the Environmental Protection Act, 415 ILCS 5/4(h). The IEPA is also seeking information on any actions you have taken or plan to take in response to the incident. Please provide IEPA with the following, to the extent applicable to this incident:

- ☐ a description of what happened and how it happened
- ☐ any mitigation actions taken at the time of the incident
- ☐ a description of any additional cleanup and preventive actions planned
- ☐ if cleanup and disposal have not been completed when you submit your response to this Incident Inquiry Letter, include in your response an estimated time schedule for completing such actions. Upon completion, please submit a final report explaining cleanup actions and disposal.
- ☐ the specific information requested in the enclosed attachment(s)

A written response to this Incident Inquiry Letter is expected by August 27, 2010. If any remediation activities are not completed by this date, submit all information available and a schedule for the completion of the rest. The IEMA Incident number, city, county and responsible party name should be noted in all correspondence about this incident. Please submit one copy of your response to:

Illinois Environmental Protection Agency
Office of Emergency Response
Emergency Operations Unit
1021 North Grand Avenue East
P.O. Box 19276, Mail Drop #29
Springfield, Illinois 62794-9276

Illinois Environmental Protection Agency
Emergency Operations Unit
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions regarding any of the above, please contact the undersigned at 847/294-4000.

Sincerely,



Don Klopke, Senior Emergency Responder
Emergency Operations Unit
Office of Emergency Response

cc: Incident File
Des Plaines EOU
John Waligore

ORTEK INC.

"Recycling for Tomorrow's Future"

August 5, 2010

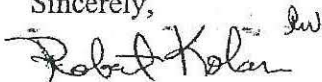
Illinois Environmental Protection Agency
Office of Emergency Operations Unit
1021 North Grand Avenue East
P.O. Box 19276, Mail Drop #29
Springfield, IL 62794-9276

Re: IEMA Incident 20100795/20100797, McCook, Cook County, Illinois

To Whom it may concern:

We are responding to the letter dated July 28, 2010, from the Illinois Environmental Protection Agency regarding Incident 20100795/20100797, McCook, Cook County, Illinois. The clean-up is being addressed by Anna VanOrden and we are complying. A full report will be submitted by Anna when the project has been completed.

Sincerely,



Robert Kolar
Plant Manager

cc: Mr. Don Klopke, Senior Emergency Responder
Illinois Environmental Protection Agency
9511 West Harrison
Des Plaines, IL 60016

STAT Analysis Corporation

2242 West Harrison St., Suite 200, Chicago, IL 60612-3766

Tel: (312) 733-0551 Fax: (312) 733-2386 STATinfo@STATAnalysis.com

Accreditation Numbers: IEPA ELAP 100445; ORELAP IL300001; AIHA 101160; NVLAP LabCode 101202-0

August 13, 2010

Chicago Diversified Projects
6015 N. Ridge
Chicago, IL 60660
Telephone: (773) 465-7700
Fax: (773) 973-5073

RE: EC-7000

STAT Project No: 10080152

Dear Don Gors:

STAT Analysis received 9 samples for the referenced project on 8/5/2010 1:30:00 PM. The analytical results are presented in the following report.

All analyses were performed in accordance with the requirements of 35 IAC Part 186 / NELAC standards. Analyses were performed in accordance with methods as referenced on the analytical report. Those analytical results expressed on a dry weight basis are also noted on the analytical report.

All analyses were performed within established holding time criteria, and all Quality Control criteria met EPA or laboratory specifications except when noted in the Case Narrative or Analytical Report. If required, an estimate of uncertainty for the analyses can be provided. A listing of accredited methods/parameters can also be provided.

Thank you for the opportunity to serve you and I look forward to working with you in the future. If you have any questions regarding the enclosed materials, please contact me at (312) 733-0551.

Sincerely,



Catia Giannini
Project Manager

The information contained in this report and any attachments is confidential information intended only for the use of the individual or entities named above. The results of this report relate only to the samples tested. If you have received this report in error, please notify us immediately by phone. This report shall not be reproduced, except in its entirety, unless written approval has been obtained from the laboratory.

Client: Chicago Diversified Projects
Project: EC-7000
Lab Order: 10080152

Work Order Sample Summary

Lab Sample ID	Client Sample ID	Tag Number	Collection Date	Date Received
10080152-001A	#1 Soil		8/4/2010 8:00:00 PM	8/5/2010
10080152-002A	#2 Soil		8/4/2010 8:10:00 PM	8/5/2010
10080152-003A	#3 Soil		8/4/2010 8:15:00 PM	8/5/2010
10080152-004A	#4 Soil		8/4/2010 8:20:00 PM	8/5/2010
10080152-005A	#5 Soil		8/4/2010 8:25:00 PM	8/5/2010
10080152-006A	#6 Soil		8/4/2010 8:30:00 PM	8/5/2010
10080152-007A	#7 Soil		8/4/2010 8:35:00 PM	8/5/2010
10080152-008A	#8 Soil		8/4/2010 8:40:00 PM	8/5/2010
10080152-009A	#9 Soil		8/4/2010 8:45:00 PM	8/5/2010

STAT Analysis Corporation

2242 West Harrison St., Suite 200, Chicago, IL 60612-3766

Tel: (312) 733-0551 Fax: (312) 733-2386 STATinfo@STATAnalysis.com

Accreditation Numbers: IEPA ELAP 100445; ORELAP IL300001; AIHA 101160; NVLAP LabCode 101202-0

Report Date: August 13, 2010

Print Date: August 13, 2010

Client: Chicago Diversified Projects
 Lab Order: 10080152
 Project: EC-7000
 Lab ID: 10080152-001A

Client Sample ID: #1 Soil
 Tag Number:
 Collection Date: 8/4/2010 8:00:00 PM
 Matrix: Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
	SW8270C-SIM (SW3550B)			Prep Date: 8/11/2010		Analyst: VS
Acenaphthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Acenaphthylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benz(a)anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(a)pyrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(b)fluoranthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(g,h,i)perylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(k)fluoranthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Chrysene	ND	0.041		mg/Kg-dry	10	8/11/2010
Dibenz(a,h)anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Fluoranthene	0.054	0.041		mg/Kg-dry	10	8/11/2010
Fluorene	ND	0.041		mg/Kg-dry	10	8/11/2010
Indeno(1,2,3-cd)pyrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Naphthalene	ND	0.041		mg/Kg-dry	10	8/11/2010
Phenanthrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Pyrene	0.058	0.041		mg/Kg-dry	10	8/11/2010
BTEX by GC/MS						
	SW8260B			Prep Date: 8/5/2010		Analyst: PS
Benzene	ND	0.0056		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0056		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0056		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.018		mg/Kg-dry	1	8/9/2010
Percent Moisture						
	D2974			Prep Date: 8/9/2010		Analyst: JP
Percent Moisture	20.2	0.2		wt%	1	8/10/2010

Qualifiers: ND - Not Detected at the Reporting Limit
 J - Analyte detected below quantitation limits
 B - Analyte detected in the associated Method Blank
 HT - Sample received past holding time
 * - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
 S - Spike Recovery outside accepted recovery limits
 R - RPD outside accepted recovery limits
 E - Value above quantitation range
 H - Holding time exceeded

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Accreditation Numbers: IEPA ELAP 100445; ORELAP IL300001; AIHA 101160; NVLAP LabCode 101202-0

Report Date: August 13, 2010

Print Date: August 13, 2010

Client:	Chicago Diversified Projects	Client Sample ID:	#2 Soil
Lab Order:	10080152	Tag Number:	
Project:	EC-7000	Collection Date:	8/4/2010 8:10:00 PM
Lab ID:	10080152-002A	Matrix:	Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
	SW8270C-SIM (SW3550B)		Prep Date: 8/11/2010		Analyst: VS	
Acenaphthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Acenaphthylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benz(a)anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(a)pyrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(b)fluoranthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(g,h,i)perylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(k)fluoranthene	0.062	0.041		mg/Kg-dry	10	8/11/2010
Chrysene	ND	0.041		mg/Kg-dry	10	8/11/2010
Dibenz(a,h)anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Fluoranthene	0.041	0.041		mg/Kg-dry	10	8/11/2010
Fluorene	ND	0.041		mg/Kg-dry	10	8/11/2010
Indeno(1,2,3-cd)pyrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Naphthalene	ND	0.041		mg/Kg-dry	10	8/11/2010
Phenanthrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Pyrene	0.074	0.041		mg/Kg-dry	10	8/11/2010
BTEX by GC/MS						
	SW8260B		Prep Date: 8/5/2010		Analyst: PS	
Benzene	ND	0.0059		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0059		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0059		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.018		mg/Kg-dry	1	8/9/2010
Percent Moisture						
	D2974		Prep Date: 8/9/2010		Analyst: JP	
Percent Moisture	20.0	0.2		wt%	1	8/10/2010

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
HT - Sample received past holding time
* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
H - Holding time exceeded

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Accreditation Numbers: IEPA ELAP 100445; ORELAP IL300001; AIHA 101160; NVLAP LabCode 101202-0

Report Date: August 13, 2010

Print Date: August 13, 2010

Client:	Chicago Diversified Projects	Client Sample ID:	#3 Soil			
Lab Order:	10080152	Tag Number:				
Project:	EC-7000	Collection Date:	8/4/2010 8:15:00 PM			
Lab ID:	10080152-003A	Matrix:	Soil			
Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
	SW8270C-SIM (SW3550B)		Prep Date: 8/11/2010		Analyst: VS	
Acenaphthene	0.042	0.038		mg/Kg-dry	10	8/11/2010
Acenaphthylene	0.042	0.038		mg/Kg-dry	10	8/11/2010
Anthracene	ND	0.038		mg/Kg-dry	10	8/11/2010
Benz(a)anthracene	0.042	0.038		mg/Kg-dry	10	8/11/2010
Benzo(a)pyrene	ND	0.038		mg/Kg-dry	10	8/11/2010
Benzo(b)fluoranthene	ND	0.038		mg/Kg-dry	10	8/11/2010
Benzo(g,h,i)perylene	ND	0.038		mg/Kg-dry	10	8/11/2010
Benzo(k)fluoranthene	ND	0.038		mg/Kg-dry	10	8/11/2010
Chrysene	0.053	0.038		mg/Kg-dry	10	8/11/2010
Dibenz(a,h)anthracene	ND	0.038		mg/Kg-dry	10	8/11/2010
Fluoranthene	0.061	0.038		mg/Kg-dry	10	8/11/2010
Fluorene	ND	0.038		mg/Kg-dry	10	8/11/2010
Indeno(1,2,3-cd)pyrene	ND	0.038		mg/Kg-dry	10	8/11/2010
Naphthalene	0.099	0.038		mg/Kg-dry	10	8/11/2010
Phenanthrene	0.08	0.038		mg/Kg-dry	10	8/11/2010
Pyrene	0.095	0.038		mg/Kg-dry	10	8/11/2010
BTEX by GC/MS						
	SW8260B		Prep Date: 8/5/2010		Analyst: PS	
Benzene	ND	0.0051		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0051		mg/Kg-dry	1	8/9/2010
Ethylbenzene	0.0074	0.0051		mg/Kg-dry	1	8/9/2010
Xylenes, Total	0.033	0.015		mg/Kg-dry	1	8/9/2010
Percent Moisture						
	D2974		Prep Date: 8/9/2010		Analyst: JP	
Percent Moisture	14.1	0.2	*	wt%	1	8/10/2010

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
HT - Sample received past holding time
* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
H - Holding time exceeded

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Report Date: August 13, 2010

Print Date: August 13, 2010

Client:	Chicago Diversified Projects	Client Sample ID:	#4 Soil
Lab Order:	10080152	Tag Number:	
Project:	EC-7000	Collection Date:	8/4/2010 8:20:00 PM
Lab ID:	10080152-004A	Matrix:	Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
	SW8270C-SIM (SW3550B)			Prep Date: 8/11/2010		Analyst: VS
Acenaphthene	ND	0.041		mg/Kg-dry	10	8/12/2010
Acenaphthylene	ND	0.041		mg/Kg-dry	10	8/12/2010
Anthracene	ND	0.041		mg/Kg-dry	10	8/12/2010
Benzo(a)anthracene	0.084	0.041		mg/Kg-dry	10	8/12/2010
Benzo(a)pyrene	0.079	0.041		mg/Kg-dry	10	8/12/2010
Benzo(b)fluoranthene	0.1	0.041		mg/Kg-dry	10	8/12/2010
Benzo(g,h,i)perylene	ND	0.041		mg/Kg-dry	10	8/12/2010
Benzo(k)fluoranthene	0.063	0.041		mg/Kg-dry	10	8/12/2010
Chrysene	0.1	0.041		mg/Kg-dry	10	8/12/2010
Dibenz(a,h)anthracene	ND	0.041		mg/Kg-dry	10	8/12/2010
Fluoranthene	0.17	0.041		mg/Kg-dry	10	8/12/2010
Fluorene	ND	0.041		mg/Kg-dry	10	8/12/2010
Indeno(1,2,3-cd)pyrene	ND	0.041		mg/Kg-dry	10	8/12/2010
Naphthalene	ND	0.041		mg/Kg-dry	10	8/12/2010
Phenanthrene	0.084	0.041		mg/Kg-dry	10	8/12/2010
Pyrene	0.18	0.041		mg/Kg-dry	10	8/12/2010
BTEX by GC/MS						
	SW8260B			Prep Date: 8/5/2010		Analyst: PS
Benzene	ND	0.0071		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0071		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0071		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.021		mg/Kg-dry	1	8/9/2010
Percent Moisture						
	D2974			Prep Date: 8/9/2010		Analyst: JP
Percent Moisture	20.8	0.2	*	wt%	1	8/10/2010

Qualifiers:

ND - Not Detected at the Reporting Limit

J - Analyte detected below quantitation limits

B - Analyte detected in the associated Method Blank

HT - Sample received past holding time

* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

H - Holding time exceeded

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Report Date: August 13, 2010

Print Date: August 13, 2010

Client: Chicago Diversified Projects
Lab Order: 10080152
Project: EC-7000
Lab ID: 10080152-005A

Client Sample ID: #5 Soil
Tag Number:
Collection Date: 8/4/2010 8:25:00 PM
Matrix: Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
SW8270C-SIM (SW3550B)			Prep Date: 8/11/2010		Analyst: VS	
Acenaphthene	ND	0.049		mg/Kg-dry	10	8/12/2010
Acenaphthylene	ND	0.049		mg/Kg-dry	10	8/12/2010
Anthracene	ND	0.049		mg/Kg-dry	10	8/12/2010
Benz(a)anthracene	0.14	0.049		mg/Kg-dry	10	8/12/2010
Benzo(a)pyrene	0.14	0.049		mg/Kg-dry	10	8/12/2010
Benzo(b)fluoranthene	0.13	0.049		mg/Kg-dry	10	8/12/2010
Benzo(g,h,i)perylene	0.065	0.049		mg/Kg-dry	10	8/12/2010
Benzo(k)fluoranthene	0.17	0.049		mg/Kg-dry	10	8/12/2010
Chrysene	0.16	0.049		mg/Kg-dry	10	8/12/2010
Dibenz(a,h)anthracene	ND	0.049		mg/Kg-dry	10	8/12/2010
Fluoranthene	0.31	0.049		mg/Kg-dry	10	8/12/2010
Fluorene	ND	0.049		mg/Kg-dry	10	8/12/2010
Indeno(1,2,3-cd)pyrene	0.055	0.049		mg/Kg-dry	10	8/12/2010
Naphthalene	ND	0.049		mg/Kg-dry	10	8/12/2010
Phenanthrene	0.14	0.049		mg/Kg-dry	10	8/12/2010
Pyrene	0.28	0.049		mg/Kg-dry	10	8/12/2010
BTEX by GC/MS						
SW8260B			Prep Date: 8/5/2010		Analyst: PS	
Benzene	ND	0.0085		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0085		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0085		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.026		mg/Kg-dry	1	8/9/2010
Percent Moisture						
D2974			Prep Date: 8/9/2010		Analyst: JP	
Percent Moisture	33.8	0.2	*	wt%	1	8/10/2010

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
HT - Sample received past holding time
* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
H - Holding time exceeded

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Accreditation Numbers: IEPA ELAP 100445; ORELAP IL300001; AIHA 101160; NVLAP LabCode 101202-0

Report Date: August 13, 2010

Print Date: August 13, 2010

Client: Chicago Diversified Projects
Lab Order: 10080152
Project: EC-7000
Lab ID: 10080152-006A

Client Sample ID: #6 Soil
Tag Number:
Collection Date: 8/4/2010 8:30:00 PM
Matrix: Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
	SW8270C-SIM (SW3550B)			Prep Date: 8/11/2010		Analyst: VS
Acenaphthene	ND	0.041		mg/Kg-dry	10	8/12/2010
Acenaphthylene	ND	0.041		mg/Kg-dry	10	8/12/2010
Anthracene	ND	0.041		mg/Kg-dry	10	8/12/2010
Benz(a)anthracene	0.058	0.041		mg/Kg-dry	10	8/12/2010
Benzo(a)pyrene	0.041	0.041		mg/Kg-dry	10	8/12/2010
Benzo(b)fluoranthene	0.075	0.041		mg/Kg-dry	10	8/12/2010
Benzo(g,h,i)perylene	0.066	0.041		mg/Kg-dry	10	8/12/2010
Benzo(k)fluoranthene	0.079	0.041		mg/Kg-dry	10	8/12/2010
Chrysene	0.075	0.041		mg/Kg-dry	10	8/12/2010
Dibenz(a,h)anthracene	ND	0.041		mg/Kg-dry	10	8/12/2010
Fluoranthene	0.12	0.041		mg/Kg-dry	10	8/12/2010
Fluorene	ND	0.041		mg/Kg-dry	10	8/12/2010
Indeno(1,2,3-cd)pyrene	0.046	0.041		mg/Kg-dry	10	8/12/2010
Naphthalene	ND	0.041		mg/Kg-dry	10	8/12/2010
Phenanthrene	0.058	0.041		mg/Kg-dry	10	8/12/2010
Pyrene	0.1	0.041		mg/Kg-dry	10	8/12/2010
BTEX by GC/MS						
	SW8260B			Prep Date: 8/5/2010		Analyst: PS
Benzene	ND	0.0062		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0062		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0062		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.019		mg/Kg-dry	1	8/9/2010
Percent Moisture						
	D2974			Prep Date: 8/9/2010		Analyst: JP
Percent Moisture	20.0	0.2	*	wt%	1	8/10/2010

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
HT - Sample received past holding time
* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
H - Holding time exceeded

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Accreditation Numbers: IEPA ELAP 100445; ORELAP IL300001; AIHA 101160; NVLAP LabCode 101202-0

Report Date: August 13, 2010

Print Date: August 13, 2010

Client:	Chicago Diversified Projects	Client Sample ID:	#7 Soil
Lab Order:	10080152	Tag Number:	
Project:	EC-7000	Collection Date:	8/4/2010 8:35:00 PM
Lab ID:	10080152-007A	Matrix:	Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
SW8270C-SIM (SW3550B) Prep Date: 8/11/2010 Analyst: VS						
Acenaphthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Acenaphthylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benz(a)anthracene	0.075	0.041		mg/Kg-dry	10	8/11/2010
Benzo(a)pyrene	0.083	0.041		mg/Kg-dry	10	8/11/2010
Benzo(b)fluoranthene	0.075	0.041		mg/Kg-dry	10	8/11/2010
Benzo(g,h,i)perylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(k)fluoranthene	0.1	0.041		mg/Kg-dry	10	8/11/2010
Chrysene	0.092	0.041		mg/Kg-dry	10	8/11/2010
Dibenz(a,h)anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Fluoranthene	0.17	0.041		mg/Kg-dry	10	8/11/2010
Fluorene	ND	0.041		mg/Kg-dry	10	8/11/2010
Indeno(1,2,3-cd)pyrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Naphthalene	ND	0.041		mg/Kg-dry	10	8/11/2010
Phenanthrene	0.075	0.041		mg/Kg-dry	10	8/11/2010
Pyrene	0.14	0.041		mg/Kg-dry	10	8/11/2010
BTEX by GC/MS						
SW8260B Prep Date: 8/5/2010 Analyst: PS						
Benzene	ND	0.0066		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0066		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0066		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.02		mg/Kg-dry	1	8/9/2010
Percent Moisture						
D2974 Prep Date: 8/9/2010 Analyst: JP						
Percent Moisture	20.3		*	wt%	1	8/10/2010

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
HT - Sample received past holding time
* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
H - Holding time exceeded

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Report Date: August 13, 2010

Print Date: August 13, 2010

Client: Chicago Diversified Projects
Lab Order: 10080152
Project: EC-7000
Lab ID: 10080152-008A

Client Sample ID: #8 Soil
Tag Number:
Collection Date: 8/4/2010 8:40:00 PM
Matrix: Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
	SW8270C-SIM (SW3550B)		Prep Date: 8/11/2010		Analyst: VS	
Acenaphthene	ND	0.044		mg/Kg-dry	10	8/11/2010
Acenaphthylene	ND	0.044		mg/Kg-dry	10	8/11/2010
Anthracene	ND	0.044		mg/Kg-dry	10	8/11/2010
Benzo(a)anthracene	0.075	0.044		mg/Kg-dry	10	8/11/2010
Benzo(a)pyrene	0.075	0.044		mg/Kg-dry	10	8/11/2010
Benzo(b)fluoranthene	0.084	0.044		mg/Kg-dry	10	8/11/2010
Benzo(g,h,i)perylene	ND	0.044		mg/Kg-dry	10	8/11/2010
Benzo(k)fluoranthene	0.066	0.044		mg/Kg-dry	10	8/11/2010
Chrysene	0.084	0.044		mg/Kg-dry	10	8/11/2010
Dibenz(a,h)anthracene	ND	0.044		mg/Kg-dry	10	8/11/2010
Fluoranthene	0.15	0.044		mg/Kg-dry	10	8/11/2010
Fluorene	ND	0.044		mg/Kg-dry	10	8/11/2010
Indeno(1,2,3-cd)pyrene	ND	0.044		mg/Kg-dry	10	8/11/2010
Naphthalene	ND	0.044		mg/Kg-dry	10	8/11/2010
Phenanthrene	0.066	0.044		mg/Kg-dry	10	8/11/2010
Pyrene	0.14	0.044		mg/Kg-dry	10	8/11/2010
BTEX by GC/MS						
	SW8260B		Prep Date: 8/5/2010		Analyst: PS	
Benzene	ND	0.0057		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0057		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0057		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.017		mg/Kg-dry	1	8/9/2010
Percent Moisture						
	D2974		Prep Date: 8/9/2010		Analyst: JP	
Percent Moisture	24.5	0.2	*	wt%	1	8/10/2010

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
HT - Sample received past holding time
* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
H - Holding time exceeded

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Report Date: August 13, 2010

Print Date: August 13, 2010

Client: Chicago Diversified Projects
Lab Order: 10080152
Project: EC-7000
Lab ID: 10080152-009A

Client Sample ID: #9 Soil
Tag Number:
Collection Date: 8/4/2010 8:45:00 PM
Matrix: Soil

Analyses	Result	RL	Qualifier	Units	DF	Date Analyzed
Polynuclear Aromatic Hydrocarbons						
	SW8270C-SIM (SW3550B)		Prep Date: 8/11/2010		Analyst: VS	
Acenaphthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Acenaphthylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benz(a)anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(a)pyrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(b)fluoranthene	0.05	0.041		mg/Kg-dry	10	8/11/2010
Benzo(g,h,i)perylene	ND	0.041		mg/Kg-dry	10	8/11/2010
Benzo(k)fluoranthene	ND	0.041		mg/Kg-dry	10	8/11/2010
Chrysene	ND	0.041		mg/Kg-dry	10	8/11/2010
Dibenz(a,h)anthracene	ND	0.041		mg/Kg-dry	10	8/11/2010
Fluoranthene	0.083	0.041		mg/Kg-dry	10	8/11/2010
Fluorene	ND	0.041		mg/Kg-dry	10	8/11/2010
Indeno(1,2,3-cd)pyrene	ND	0.041		mg/Kg-dry	10	8/11/2010
Naphthalene	ND	0.041		mg/Kg-dry	10	8/11/2010
Phenanthrene	0.042	0.041		mg/Kg-dry	10	8/11/2010
Pyrene	0.066	0.041		mg/Kg-dry	10	8/11/2010
BTEX by GC/MS						
	SW8260B		Prep Date: 8/5/2010		Analyst: PS	
Benzene	ND	0.0058		mg/Kg-dry	1	8/9/2010
Toluene	ND	0.0058		mg/Kg-dry	1	8/9/2010
Ethylbenzene	ND	0.0058		mg/Kg-dry	1	8/9/2010
Xylenes, Total	ND	0.018		mg/Kg-dry	1	8/9/2010
Percent Moisture						
	D2974		Prep Date: 8/9/2010		Analyst: JP	
Percent Moisture	20.3	0.2	*	wt%	1	8/10/2010

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
HT - Sample received past holding time
* - Non-accredited parameter

RL - Reporting / Quantitation Limit for the analysis
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
H - Holding time exceeded

2242 W. Harrison Suite 200, Chicago, Illinois 60612 Phone: (312) 733-0551 Fax: (312) 733-2386

e-mail address: STATinfo@STATanalysis.com

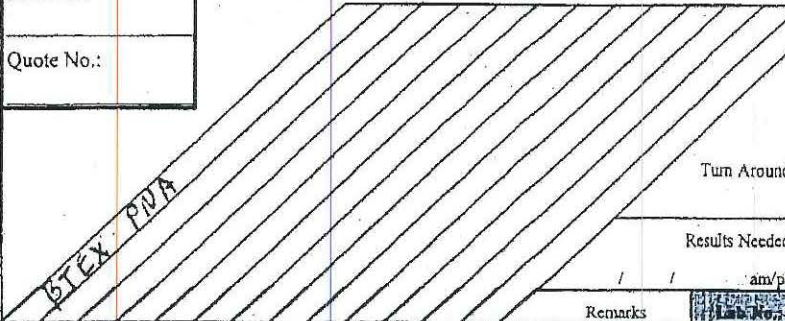
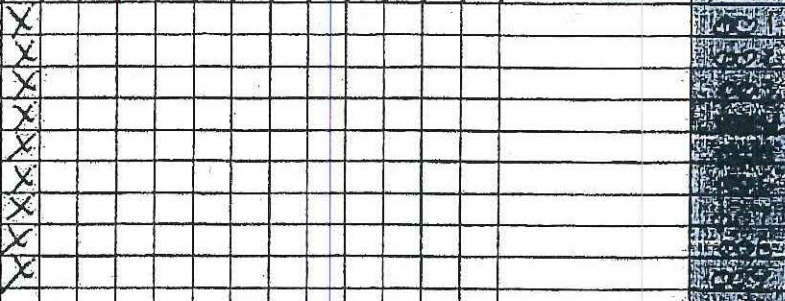


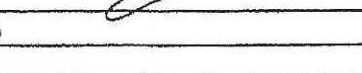



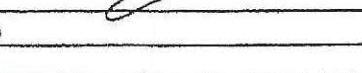



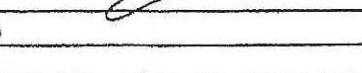



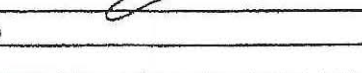



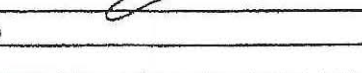



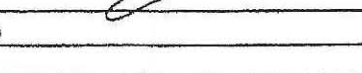



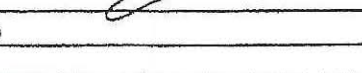



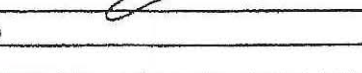



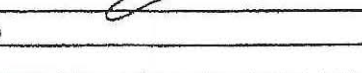



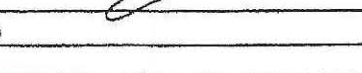



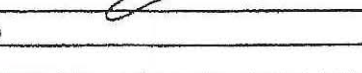



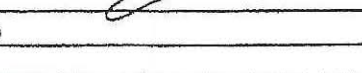

AIHA, NVLAP and NELAP accredited

CHAIN OF CUSTODY RECORD

Nº:

Page : 4 of 4

ONE ONE

Company: CHICAGO DIVERSIFIED PROJECTS INC.					P.O. No.:			
Project Number: EC-7000			Client Tracking No.:					
Project Name:					Quote No.:			
Project Location:					<div style="text-align: center;">  </div>			
Sampler(s): DONGORS								
Report To: CHICAGO DIVERSIFIED								
Phone: 773-465-7700			Turn Around:					
Fax: 773-973-5073			Results Needed:					
QC Level: 1 2 3 4			e-mail:					
Client Sample Number/Description:	Date Taken	Time Taken	Matrix	Comp.	Grab	Preserv.	No. of Containers	<div style="text-align: center;">  </div>
#1 SOIL	8-4-10	8:00						
#2 SOIL		8:10						
#3 SOIL		8:15						
#4 SOIL		8:20						
#5 SOIL		8:25						
#6 SOIL		8:30						
#7 SOIL		8:35						
#8 SOIL		8:40						
#9 SOIL		8:45						
<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
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<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
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<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time: Date/Time: Date/Time: </div> <div> Comments: </div> </div>								
<div style="display: flex; justify-content: space-between;"> <div> Relinquished by: (Signature)  Received by: (Signature)  Relinquished by: (Signature)  Received by: (Signature)  </div> <div> Date/Time: 8-5-10 1330 Date/Time: 8/5/10 1330 Date/Time: Date/Time</div></div>								

Sample Receipt Checklist

Client Name CDP

Date and Time Received: 8/5/2010 1:30:00 PM

Work Order Number 10080152

Received by: CDF

Checklist completed by:

Signature

Date

8/5/10

Reviewed by:

Initials

Date

CV 8/5/10

Matrix:

Carrier name: Client Delivered

Shipping container/cooler in good condition?

Yes ☒

No ☐

Not Present ☐

Custody seals intact on shipping container/cooler?

Yes ☐

No ☐

Not Present ☒

Custody seals intact on sample bottles?

Yes ☐

No ☐

Not Present ☒

Chain of custody present?

Yes ☒

No ☐

Chain of custody signed when relinquished and received?

Yes ☒

No ☐

Chain of custody agrees with sample labels/containers?

Yes ☒

No ☐

Samples in proper container/bottle?

Yes ☒

No ☐

Sample containers intact?

Yes ☒

No ☐

Sufficient sample volume for indicated test?

Yes ☒

No ☐

All samples received within holding time?

Yes ☒

No ☐

Container or Temp Blank temperature in compliance?

Yes ☒

No ☐

Temperature 1.3 °C

Water - VOA vials have zero headspace?

No VOA vials submitted ☒

Yes ☐

No ☐

Water - Samples pH checked?

Yes ☒

No ☐

Checked by:

Water - Samples properly preserved?

Yes ☒

No ☐

pH Adjusted?

Any No response must be detailed in the comments section below.

Comments:

Client / Person contacted:

Date contacted:

Contacted by:

Response:

Laboratory ID :

Client Sample ID :

Date Collected :

		Route Specific Limits for Soil		Soil Comparison Groundwater Ingestion Exposure Route Values		
		Ingestion	Inhalation	Class I	Class II	ADL
BTEx	71-43-2 Benzene	12	0.8	0.03	0.17	
	108-88-3 Toluene	16,000	650 / 42*	12	29	
	100-41-4 Ethylbenzene	7,800	400 / 58*	13	19	
	1330-20-7 Xylenes, Total	16,000	320 / 5.6*	150	150	
PNA	83-32-9 Acenaphthene	4,700	---	570	2,900	
	208-96-8 Acenaphthylene					
	120-12-7 Anthracene	23,000	---	12,000	59,000	
	56-55-3 Benz(a)anthracene	0.9	---	2	8	
	50-32-8 Benzo(a)pyrene	0.09	---	8	82	
	205-99-2 Benzo(b)fluoranthene	0.9	---	5	25	
	191-24-2 Benzo(g,h,i)perylene					
	207-08-9 Benzo(k)fluoranthene	9	---	49	250	
	218-01-9 Chrysene	88	---	160	800	
	53-70-3 Dibenz(a,h)anthracene	0.09	---	2	7.6	
	206-44-0 Fluoranthene	3,100	---	4,300	21,000	
	86-73-7 Fluorene	3,100	---	560	2,800	
	193-39-5 Indeno(1,2,3-cd)pyrene	0.9	---	14	69	
	91-20-3 Naphthalene	1,600	170 / 1.8*	12	18	
	85-01-8 Phenanthrene					
	129-00-0 Pyrene	2,300	---	4,200	21,000	

* - Construction Worker Inhalation Objective from Appendix B, Table B.

10080152Res

10080152-001	10080152-002	10080152-003	10080152-004	10080152-005	10080152-006
#1 Soil	#2 Soil	#3 Soil	#4 Soil	#5 Soil	#6 Soil
08/04/2010 20:00	08/04/2010 20:10	08/04/2010 20:15	08/04/2010 20:20	08/04/2010 20:25	08/04/2010 20:30

<0.0056	<0.0059	<0.0051	<0.0071	<0.0085	<0.0062
<0.0056	<0.0059	<0.0051	<0.0071	<0.0085	<0.0062
<0.0056	<0.0059	0.0074	<0.0071	<0.0085	<0.0062
<0.018	<0.018	0.033	<0.021	<0.026	<0.019
<0.041	<0.041	0.042	<0.041	<0.049	<0.041
<0.041	<0.041	0.042	<0.041	<0.049	<0.041
<0.041	<0.041	<0.038	<0.041	<0.049	<0.041
<0.041	<0.041	0.042	0.084	0.14	0.058
<0.041	<0.041	<0.038	0.079	0.14	0.041
<0.041	<0.041	<0.038	0.1	0.13	0.075
<0.041	<0.041	<0.038	<0.041	0.065	0.066
<0.041	0.062	<0.038	0.063	0.17	0.079
<0.041	<0.041	0.053	0.1	0.16	0.075
<0.041	<0.041	<0.038	<0.041	<0.049	<0.041
0.054	0.041	0.061	0.17	0.31	0.12
<0.041	<0.041	<0.038	<0.041	<0.049	<0.041
<0.041	<0.041	<0.038	<0.041	0.055	0.046
<0.041	<0.041	0.099	<0.041	<0.049	<0.041
<0.041	<0.041	0.08	0.084	0.14	0.058
0.058	0.074	0.095	0.18	0.28	0.1

10080152-007	10080152-008	10080152-009
#7 Soil	#8 Soil	#9 Soil
08/04/2010 20:35	08/04/2010 20:40	08/04/2010 20:45

<0.0066	<0.0057	<0.0058
<0.0066	<0.0057	<0.0058
<0.0066	<0.0057	<0.0058
<0.02	<0.017	<0.018
<0.041	<0.044	<0.041
<0.041	<0.044	<0.041
<0.041	<0.044	<0.041
0.075	0.075	<0.041
0.083	0.075	<0.041
0.075	0.084	0.05
<0.041	<0.044	<0.041
0.1	0.066	<0.041
0.092	0.084	<0.041
<0.041	<0.044	<0.041
0.17	0.15	0.083
<0.041	<0.044	<0.041
<0.041	<0.044	<0.041
<0.041	<0.044	<0.041
0.075	0.066	0.042
0.14	0.14	0.066

ATTACHMENT J

Special Waste Annual Report



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

Illinois Nonhazardous Special Waste Annual Report

Site Information Form

(This form must be completed for each site that submits an annual report)

Reporting Year: 2010

Site Information:

Site IEPA Identification Number: 0311740002

Site Name: Ortek, Inc.

Site Street Address: 7601 W. 47th St.

Site City: McCook

Site State: IL Site Zip Code: 60525 Site Telephone: 708-762-5117

Check one of the following, if applicable: If checked, no other forms are required to be completed.

☐ **Generator** - No nonhazardous special waste was shipped to an out of state TSDR Facility in this reporting year.

☐ **Facility TSDR** - No nonhazardous special waste was received at this TSDR Facility in this reporting year.

Site Mailing Address Information:

(Complete the following information only if site mailing label is incorrect.)

Company: Telephone:

Contact Person:

Street Address: P. O. Box:

City: State: Zip Code:

Annual Report Certification

I certify under penalty of law that I have examined and am familiar with the information submitted in this and any attached continuation sheets or other attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(b).)

Name (print/type): Lowell Aughenbaugh

Telephone: 708-762-5117

Signature: L. Aughenbaugh

Date: 8/10/11

This Agency is authorized to require this information under Illinois Revised Statutes, 1989, Chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continued, a fine up to \$50,000 and imprisonment up to 5 years. This form has been approved by Forms Management Center.

Rockford • 4302 N. Main St., Rockford, IL 61103 • (815) 397-7760

Elgin • 595 S. State, Elgin, IL 60123 • (847) 608-3131

Bureau of Land - Peoria • 7620 N. University St., Peoria, IL 61614 • (309) 693-5462

Collinsville • 2009 Main Street, Collinsville, IL 62234 • (618) 346-5120

Des Plaines • 9511 W. Harrison St., Des Plaines, IL 60016 • (847) 294-4000

Peoria • 5415 N. University St., Peoria, IL 61614 • (309) 693-5463

Champaign • 2125 S. First St., Champaign, IL 61820 • (217) 272-5800

Marion • 2309 W. Main St., Suite 116, Marion, IL 62959 • (618) 993-7200



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

Illinois Facility Nonhazardous Special Waste 2010 Annual Report

Facility IEPA Number, Name & Address

Page 1 of 2
Unit of measure = gallons

Record Field	Management Code	Generator Name & Address (Address must match ID #)	Generator IEPA ID #	Waste Code	Quantity	UOM	Comments
A.	13/14	<u>total processed</u> <u>ORTEK Rec'd</u> <u>IAC 739.157 (b)</u>	<u>IAC 739.157 (b)</u>	<u>13/14</u>	<u>310,753</u>	<u>1</u>	<u>used oil</u>
B.	13/14	<u>total rec'd/processed</u> <u>by Ortek</u> <u>IAC 739.157 (b)</u>	<u>"</u>	<u>13/14</u>	<u>4,238,800</u>	<u>1</u>	<u>Oil waste water</u>
C.	13/14	<u>total rec'd/processed</u> <u>by Ortek</u> <u>IAC 739.157 (b)</u>	<u>"</u>	<u>13/14</u>	<u>186,350</u>	<u>1</u>	<u>Emulsified coolant metal work</u>
D.							
E.							
F.							
G.							
H.							
I.							
J.							

IL 532-1952
10/20/2011 11:59 AM

Rockford • 302 N. Main St., Rockford, IL 61103 • (815) 987-7760

Elgin • 595 S. State, Elgin, IL 60123 • (847) 600-3131

Bureau of Land • Peoria • 7620 N. University St., Peoria, IL 61614 • (309) 693-5462

Collinsville • 2009 Mall Street, Collinsville, IL 62234 • (618) 346-5120

Des Plaines • 9511 W. Harrison St., Des Plaines, IL 60016 • (847) 294-4000

Peoria • 5415 N. University St., Peoria, IL 61614 • (309) 693-3403

Champaign • 2125 S. First St., Champaign, IL 61820 • (217) 278-5800

Marion • 2309 W. Main St., Suite 116, Marion, IL 62959 • (618) 993-7200

Nonhazardous Special Waste Annual Report

Facility Instructions: Please print or type report. Photocopy form as needed.

This Nonhazardous Annual Report is required under the Illinois Environmental Protection Act 22.01 and 35 Illinois Administrative Code 809.501(j). This regulation requires you to report the types and quantities of nonhazardous special waste treated, stored, disposed or recycled at your facility, and to identify the generators of this waste. Please note that Polychlorinated Biphenyls (PCB's) must be included on this report.

Reports are due at the IEPA by February 1 of each year. This report shall SUMMARIZE all nonhazardous special waste received the previous year (1-1-10 thru 12-31-10). Do not list individual manifest quantities. Do not send copies of the manifests; they are not required. If no waste was received at your facility, check the appropriate field on the Site Information form, sign and return form to the Agency.

Waste streams that became subject to the non-hazardous non-liquid exemption must still be reported if the required certification was not completed.

FACILITY IEPA NUMBER, NAME AND ADDRESS: Please make address and/or name changes on the Site Information form if necessary.

MANAGEMENT CODE: From the list below select the one code (number) that best identifies the final management of the waste at your facility.

- 01 Metals recovery
- 02 Solvent recovery
- 03 Other recovery (e.g. antifreeze regeneration)
- 04 Incineration
- 05 Energy recovery (burning to recover BTU value)
- 06 Fuel blending (blending waste to fuel specs)
- 07 Treatment (chemical, physical, or biological)
- 08 Land treatment, application
- 09 Landfill
- 10 Transfer station
- 11 Storage (long-term)
- 12 Other (Indicate description in comments)
- 13 Used oil regeneration
- 14 Used oil on-spec fuel blending
- 15 Used oil off-spec fuel blending
- 16 Used oil incorporation into haz-waste fuel blending

GENERATOR NAME AND ADDRESS: Complete for each generator from which waste was received. Write the generator name and address where the waste was generated, not the mailing address.

GENERATOR IEPA ID NUMBER: Write the corresponding IEPA ID Number for each generator listed. Generators address must match the ID Number.

WASTE CODE: Select the code (number) that best corresponds to the description of waste; write the code in the space provided.

NO RCRA HAZARDOUS WASTE TO BE INCLUDED

- 01 Leaking Underground Storage Tank (LUST) contaminated soil, sand and clay
- 02 Other contaminated soil, sand or clay
- 03 Other contaminated materials
- 04 PCB1 solids (capacitors, transformer carcasses)
- 05 PCB2 liquids (transformer and capacitor

- oils, etc.)
- 06 Lab Packs
- 07 Leachate
- 08 Ashes, Incinerator or boiler
- 09 Municipal waste water treatment sludges
- 10 Industrial waste water treatment sludges
- 11 Food processing wastes & Off-spec food products
- 12 Antifreeze
- 13 Waste/used oil
- 14 Other organic liquids
- 15 Other organic solids or sludges
- 16 Liquids with other metals
- 17 Solids or sludges with other metals
- 18 Other inorganic liquids
- 19 Other inorganic solids or sludges
- 20 Containerized gas
- 21 Household Hazardous Waste from collections

QUANTITY TOTAL: Write the total volume in either gallons or cubic yards for the reporting period.

UNIT OF MEASURE: Enter 1 for gallons or 2 for cubic yards.

COMMENTS: Check the comment field if you have any comments or remarks. Indicate your written comments on a separate page and reference the record field and the page number for each comment.

SITE INFORMATION FORM: This form must be completed for each site that submits an annual report.

NO WASTE RECEIVED: With the additional exemption for non-liquid nonhazardous wastes with generator certification, your facilities may not have managed any special waste in 2008. If this is true at your facility, please indicate so on the Site Information form, and sign the certification.

CERTIFICATION BY FACILITY: The owner, operator or an authorized representative must sign and date the certification on the Site Information form.

HAULER INFORMATION FORM: List all haulers and their 4-digit IL SWH permit number or their Uniform Program Permit ID number, who delivered waste to your facility.

DISTRIBUTION OF COPIES

Send the original report to the address below:

Illinois Environmental Protection Agency
Bureau of Land (#24)
Annual Reports and Data Collection Unit
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

OVERNIGHT MAILING ADDRESS:

1021 North Grand Ave East
Springfield, Illinois 62702

KEEP A COPY OF THE REPORT FOR YOUR RECORDS; IT IS REQUIRED TO BE KEPT ON-SITE FOR THREE YEARS.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 014-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

2010 Illinois Nonhazardous Special Waste Annual Report Hauler Information

Page 2 of 2

Record Field	Hauler Permit ID Number	Hauler Name	Hauler Address, City, State and Zip Code	Comments
A.	UPM-350461	North Branch Environmental	7 North 458 Garden Ave. Roselle, IL 60172	
B.	3922	Future Environmental	19701 So. 97th Ave. Mokena, IL 60448	
C.	UPW-0758-189-IL	RS Used Oil	25903 So. Ridgeland Maree, IL 60449	
D.	484475	HaizChem Environmental Corp.	1115 W. National Ave. Addison, IL 60101	
E.	1047	Duke's Oil Service	783 Fairway Dr. Bensenville, IL 60006	
F.	0344	Southwest Oil Services	17348 Deercreek Dr. Orland Park, IL 60167	
G.	5024	Illinois Recovery Group	445 Roosevelt St. Morris, IL 60450	
H.	4886	Turn-Key Environmental	750 Almar Parkway-Suite 201 Bourbonnais, IL 60914	

IL 532-2045

Rockford • 4302 N. Main St., Rockford, IL 61103 • (815) 987-7760

Elgin • 595 S. State, Elgin, IL 60123 • (847) 606-3131

Bureau of Land — Peoria • 7620 N. University St., Peoria, IL 61614 • (309) 693-5462

Collinsville • 2009 Mall Street, Collinsville, IL 62234 • (618) 346-5120

Des Plaines • 9511 W. Harrison St., Des Plaines, IL 60016 • (847) 294-4000

Peoria • 5413 N. University St., Peoria, IL 61614 • (309) 693-5463

Champaign • 2125 S. First St., Champaign, IL 61820 • (217) 278-5800

Marion • 2309 W. Main St., Suite 116, Marion, IL 62959 • (618) 993-7200

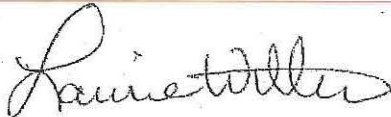
ORTEK INC.

Recycling for Tomorrow's Future

August 10, 2011

To whom it may concern:

Lowell Aughenbaugh will be out of state for the next several months.
He has given me authorization to sign on his behalf.



Laurie Witter
Office Manager
Ortek, Inc.

ATTACHMENT K

Sample Analysis

PRECISION PETROLEUM LABS, INC.

CERTIFICATE OF ANALYSIS

LABORATORY ADDRESS 5915 Star Lane, Houston, TX 77057 Ph. 713-680-9425 Fax: 713-680-9564 Website: precisionlabs.org	Client Name: Ortek Inc Street Address: 7601 W 47 th St City, State, Zip: McCook, IL 60525
--	---

INVOICE No.	49400	DATE RECEIVED	07-08-2011
LAB REFERENCE No.	2011-07-136	DATE/TIME COLLECTED	07-07-2011@2:30pm
AUTHORIZED BY	Bob Kolav	MATRIX TYPE	Liquid
PRODUCT ID	WO 4,5,6,101		

PARAMETER	TEST METHOD	REPORTING LIMIT	TEST RESULTS
PCB'S, PPM	S.W. 8082	0.50	BRL
Heavy Metals, PPM			
Arsenic	EPA-6010	0.50	BRL
Barium	EPA-6010	0.10	9.02
Cadmium	EPA-6010	0.10	BRL
Chromium	EPA-6010	0.15	179
Lead	EPA-6010	0.39	5.07
Mercury	EPA-6010	0.17	BRL
Selenium	EPA-6010	0.63	BRL
Silver	EPA-6010	0.13	BRL

Daniel Zabithi
QA Manager

Date: 07-08-2011

PRIMARY ACCREDITATION TCEQ, #T104704203-TX
ARIZONA LICENSE # AZ0630



QUALIFIERS & ABBREVIATIONS: BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Matrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance limits. Test deviation applied to Method 8260 (VOCs).

COMMENTS: There were no quality assurance anomalies associated with these tests.

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS, OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT. RESULTS ARE REPORTED ON AN "AS IS" BASIS, UNLESS OTHERWISE NOTED. THE TEST RESULTS RELATE ONLY TO THE SUBMITTED SAMPLE IDENTIFIED ON THIS REPORT. TEST RESULTS MEET ALL REQUIREMENTS OF NELAP FOR TESTS LISTED ON THE LABORATORY'S CURRENT FIELDS OF ACCREDITATION (EPA 1310, 6010, 8082, 8260, and 9073).

PRECISION PETROLEUM LABS, INC.**CERTIFICATE OF ANALYSIS****LABORATORY ADDRESS**

5915 Star Lane, Houston, TX 77057
Ph. 713-680-9425 Fax: 713-680-9564
Website: precisionlabs.org

Client Name: Ortek Inc

Street Address: 7601 W 47th St
City, State, Zip: McCook, IL 60525

INVOICE No.	49400	DATE RECEIVED	07-08-2011
LAB REFERENCE No.	2011-07-134	DATE/TIME COLLECTED	07-07-2011@2:00pm
AUTHORIZED BY	Bob Kolav	MATRIX TYPE	Liquid
PRODUCT ID	Glycol 324,325,410,411		

	<u>TEST METHOD</u>	<u>REPORTING LIMIT</u>	<u>TEST RESULTS</u>
<u>Heavy Metals, PPM</u>			
Arsenic	EPA-6010	0.50	25.28
Barium	EPA-6010	0.10	0.15
Cadmium	EPA-6010	0.10	BRL
Chromium	EPA-6010	0.15	BRL
Lead	EPA-6010	0.39	1.00
Mercury	EPA-6010	0.17	BRL
Selenium	EPA-6010	0.63	BRL
Silver	EPA-6010	0.13	BRL

Daniel Zabihi
QA Manager

Date: 07-08-2011



PRIMARY ACCREDITATION TCEQ, #T104704203-TX
ARIZONA LICENSE # A20630

QUALIFIERS & ABBREVIATIONS: BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Matrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance limits. Test deviation applied to Method 8260 (VOCs).

COMMENTS: There were no quality assurance anomalies associated with these tests.

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS, OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT. RESULTS ARE REPORTED ON AN "AS IS" BASIS, UNLESS OTHERWISE NOTED. THE TEST RESULTS RELATE ONLY TO THE SUBMITTED SAMPLE IDENTIFIED ON THIS REPORT. TEST RESULTS MEET ALL REQUIREMENTS OF NELAP FOR TESTS LISTED ON THE LABORATORY'S CURRENT FIELDS OF ACCREDITATION (EPA 1010, 6010, 8082, 8260, and 9075).

PRECISION PETROLEUM LABS, INC.**CERTIFICATE OF ANALYSIS**

LABORATORY ADDRESS 5915 Star Lane, Houston, TX 77057 Ph. 713-680-9425 Fax: 713-680-9564 Website: precisionlabs.org	Client Name: Ortek Inc Street Address: 7601 W 47 th St City, State, Zip: McCook, IL 60525
--	---

INVOICE No.	49400	DATE RECEIVED	07-08-2011
LAB REFERENCE No.	2011-07-135	DATE/TIME COLLECTED	07-07-2011@2:20pm
AUTHORIZED BY	Bob Kolav	MATRIX TYPE	Liquid
PRODUCT ID	Oil 503		

PARAMETER

PCB's, PPM

TEST**METHOD**

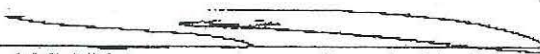
S.W.8082

REPORTING**LIMIT**

0.50

TEST**RESULT**

BRL


Daniel Zablihi
QA Manager

Date: 07-08-2011

PRIMARY ACCREDITATION TCEQ, #T104704203-TX
ARIZONA LICENSE # AZ0630

QUALIFIERS & ABBREVIATIONS: BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Matrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance limits. Test deviation applied to Method 8260 (VOCs).

COMMENTS: There were no quality assurance anomalies associated with these tests.

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS, OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT. RESULTS ARE REPORTED ON AN "AS IS" BASIS, UNLESS OTHERWISE NOTED. THE TEST RESULTS RELATE ONLY TO THE SUBMITTED SAMPLE IDENTIFIED ON THIS REPORT. TEST RESULTS MEET ALL REQUIREMENTS OF NELAP FOR TESTS LISTED ON THE LABORATORY'S CURRENT FIELDS OF ACCREDITATION (EPA 1010, 6010, 8082, 8260, and 9075).

ATTACHMENT L

Checklist

Ortek

12/21/11

and 1/30/12

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	<input type="checkbox"/> Violation Violation
	PART 739: STANDARDS FOR THE MANAGEMENT OF USED OIL	
	SUBPART B: APPLICABILITY	
	Note: Used oil not exceeding any specification level of Section 739.111 is subject only to Sections 739.172, 739.173 and 739.174(b).	
	Section 739.112 Prohibitions	
739.112(a)	a) Is used oil being managed only in a surface impoundment or waste pile that is regulated under Parts 724 or 725? Yes _____ No _____ N/A <u>X</u>	739.112(a)
739.112(b)	b) Is used oil being used as a dust suppressant? Yes _____ No <u>X</u> N/A <u>X</u>	739.112(b)
739.112(c)	c) Is off-spec oil fuel burned for energy recovery in only industrial furnaces identified in Section 720.111, utility boilers, or used oil fired space heaters that meet the provisions of Section 739.123? Yes _____ No _____ N/A <u>X</u>	739.112(c)
	SUBPART C: STANDARDS FOR USED OIL GENERATORS	
	Section 739.121 Hazardous Waste Mixing	
739.121(a)	Is the generator mixing hazardous waste with used oil only as provided in Section 739.110(b)(2)(B) and (C)? Yes _____ No _____ N/A _____	739.121(a)
739.121(b)	If "Yes", is the generator of a used oil containing greater than 1000 ppm total halogens managing the used oil as a hazardous waste unless the presumption is rebutted (i.e. analytical data is available)? Yes _____ No _____ N/A _____	739.121(b)
	Section 739.122 Used Oil Storage	
739.122(a)	Does the generator only store used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A _____	739.122(a)
739.122(b)	Are containers and aboveground tanks used by a generator (to store used oil) in good condition with no visible leaks? Yes _____ No _____ N/A _____	739.122(b)
739.122(c)	Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"? Yes _____ No _____ N/A _____	739.122(c)
739.122(d)	Has the generator, upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A _____	739.122(d)
	Section 739.123 On-Site Burning in Space Heaters	
739.123(a)	Is the generator burning used oil in used oil fired space heaters only when: 1) the heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourselfers (DIY) generators; and 2) the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and 3) the combustion gases from the heater are vented to the ambient air? Yes _____ No _____ N/A <u>X</u>	739.123(a)
	Section 739.124 Off-Site Shipments	
739.124	Has the generator ensured that the used oil is hauled only by transporters that have obtained a USEPA ID # and an IEPA special waste ID # pursuant to Part 809, unless the generator qualifies for an exemption pursuant to Part 739 (self transportation to aggregate points owned by the generator or tolling agreements)? Yes _____ No _____ N/A _____	739.124

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.145	<p>Section 739.145 Used Oil Storage at Transfer Stations</p> <p>Has the owner/operator of a used oil transfer facility:</p> <p>b) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No <u>X</u> N/A _____</p> <p>c) only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? Yes <u>X</u> No _____ N/A _____</p> <p>d) provided for secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A <u>X</u></p> <p>e) provided for secondary containment for existing aboveground tanks as required by this Subsection? Yes <u>X</u> No <u>X</u> N/A _____</p> <p>f) provided for secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____</p> <p>g) labeled all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes <u>X</u> No _____ N/A _____</p> <p>h) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other material; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes <u>X</u> No <u>X</u> N/A _____</p>	<p>739.145</p> <p>Tanks 746 Storage few days to weeks no secondary containment pad but no walls</p> <p>Tank 400 Future 35 day 15 day</p> <p>Tanks 746 NO 2ndary Containment Tank 400 does Small release not cleaned up</p>
739.146(a)	<p>Section 739.146 Tracking</p> <p>Has the used oil transporter kept a record of each used oil shipment that includes:</p> <p>1) the name and address of the generator, transporter, or processor (GTP) who provided the used oil for transport; and 2) the USEPA ID # and IEPA special waste ID # of the GTP that provided the used oil; and 3) the quantity of used oil accepted; and 4) the date accepted; and 5) the signature of a representative of the GTP that provided the used oil? Yes <u>X</u> No <u>X</u> N/A _____</p>	<p>739.146(a)</p> <p>Records reviewed Yes</p>
739.146(b)	<p>Has the used oil transporter kept a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor, or disposal facility that includes:</p> <p>1) the name and address of the receiving facility or transporter; and 2) the USEPA ID # and IEPA special waste ID # of the receiving facility or transporter; and 3) the quantity of used oil delivered; and 4) the date of delivery; and 5) the signature of a representative of the receiving facility or transporter? Yes _____ No _____ N/A _____</p>	<p>739.146(b)</p> <p>Needs further evaluation</p>
739.146(c)	<p>Has the used oil transporter who exports used oil to a foreign country complied with this subsection? Yes _____ No _____ N/A _____</p>	<p>739.146(c)</p>
739.146(d)	<p>Has the used oil transporter retained all records required under this Section for at least 3 years? Yes _____ No _____ N/A _____</p>	<p>739.146(d)</p>
739.147	<p>Section 739.147 Management of Residues</p> <p>Does the used oil transporter who generates residues from the storage or transportation of used oil manage the residues as specified in Section 739.110? Yes _____ No <u>X</u> N/A _____</p>	<p>739.147</p>
739.151	<p>SUBPART F: STANDARDS FOR USED OIL PROCESSORS</p> <p>Section 739.151 Notification</p> <p>Has the used oil processor obtained a USEPA ID# and an IEPA special waste ID#? Yes <u>X</u> No _____ N/A _____</p>	<p>739.151</p>

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	written waste analysis plan describing the procedures that will be used to comply with the rebuttable presumption and on-spec Sections of this Part? Yes <u>✓</u> No <u> </u> N/A <u> </u> <i>pbu followed? needs further evaluation</i>	739.155
739.156	Section 739.156 Tracking Has the used oil processor kept a record of each used oil shipment accepted for processing (i.e. invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the processor; and 2) the name and address of the generator or processor from whom the used oil was sent for processing; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the processor; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent for processing; and 5) the quantity of used oil shipped; and 6) the date of shipment? <i>per LW reviewed future violation on 12/14</i> Yes <u>✓</u> No <u> </u> N/A <u> </u>	739.156
739.156(b)	Has the used oil processor kept a record of each shipment of used oil that is delivered to a burner, processor, or disposal facility that includes: 1) the name and address of the transporter who delivers the used oil to the burner, processor or disposal facility; and 2) the name and address of the burner, processor, or disposal facility who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivers the used oil to the burner, processor, or disposal facility; and 4) the IEPA special waste ID # of the burner, processor, or disposal facility who will receive the used oil; and 5) the quantity of used oil shipped; and 6) the date of shipment? <i>per LW</i> Yes <u>✓</u> No <u> </u> N/A <u> </u>	739.156(b)
739.156(c)	Have the records described in this Section been maintained for at least 3 years? <i>per LW</i> Yes <u>✓</u> No <u> </u> N/A <u> </u>	739.156(c)
739.157(a)	Section 739.157 Operating Record and Reporting Has the owner/operator kept a written operating record at the facility that contains the following: - records and results of oil analyses performed as described in the analysis plan required under Section 739.155? - summary reports and details of all incidents that require implementation of the contingency plan as specified in Section 739.152(b)? <i>on computer - needs further analysis</i> Yes <u>✓</u> No <u> </u> N/A <u> </u>	739.157(a)
739.157(b)	Has the used oil processor reported to the Agency in the form of a letter, on a biennial basis by March 1, the following information: 1) the IEPA special waste ID #, name and address of the processor; and 2) the calendar year covered by the report; and 3) the quantities of used oil accepted for processing and the manner in which the used oil is processed, including the specific processes employed; and 4) the USEPA ID #? <i>REACT 2 yrs Ago - Bob will email report</i> Yes <u>✓</u> No <u> </u> N/A <u> </u>	739.157(b)
739.158	Section 739.158 Off-Site Shipments of Used Oil Has the used oil processor who initiates a shipment of used oil off-site used a used oil transporter that has a USEPA ID # and an IEPA special waste ID #? <i>yes</i> Yes <u>✓</u> No <u> </u> N/A <u> </u>	739.158 <i>yes records reviewed</i>
739.159	Section 739.159 Management of Residue Does the used oil processor who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes <u> </u> No <u>✓</u> N/A <u> </u>	739.159

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.165(b)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A _____	739.165(b)
739.166(a)	Section 739.166 Notice Prior to accepting the first shipment of off-spec used oil fuel, has the used oil burner provided to the GTP a one-time written and signed notice certifying that: <ol style="list-style-type: none"> the burner has notified the Agency stating the location and general description of the used oil management activities; and the burner will burn used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes _____ No _____ N/A _____ 	739.166(a)
739.166(b)	Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the GTP? Yes _____ No _____ N/A _____	739.166(b)
739.167	Section 739.167 Management of Residue Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.167
739.171	SUBPART H: STANDARDS FOR USED OIL FUEL MARKETERS Section 739.171 Prohibitions Has the used oil fuel marketer initiated a shipment of off-spec used oil only to a used oil burner that has a USEPA ID # and an IEPA special waste ID # and burns the used oil in an industrial furnace or boiler as specified in Section 739.161(a)? Yes _____ No _____ N/A _____ <i>needs further analysis</i>	739.171
739.172(b)	Section 739.172 On-Spec Used Oil Fuel Has the GTP or burner who claims that the used oil meets the specification for used oil fuel under this Part, kept copies of analyses or other information for at least 3 years? Yes _____ No _____ N/A _____	739.172(b)
739.173(a)	Section 739.173 Notification Has the used oil marketer complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.173(a)
739.174(a)	Section 739.174 Tracking Has the used oil generator kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading, or other) that includes: <ol style="list-style-type: none"> the name and address of the transporter who delivered the used oil to the burner; and the name and address of the burner who will receive the used oil; and the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and the IEPA special waste ID # of the burner; and the quantity of used oil shipped; and the date of acceptance? Yes _____ No _____ N/A _____ 	739.174(a)
739.174(b)	Has the GTP or burner who claims that the used oil meets the fuel specification under Section 739.111 kept a record of each shipment of used oil to an on-spec used oil burner that includes the following: <ol style="list-style-type: none"> the name and address of the facility receiving the shipment; and the quantity of used oil fuel delivered; and the date of shipment or delivery; and a cross-reference to the record of used oil analyses or other information used to make the determination that the oil meets the specifications as required under Section 739.172(a)? Yes _____ No _____ N/A _____ 	739.174(b)
739.174(c)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A _____	739.174(c)

ATTACHMENT M

Daily Logs and Manifests

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 1970505162		2. Page 1 of 1		3. Emergency Response Phone		4. Manifest Tracking Number 001608634 GBF							
		Generator's Name and Mailing Address 20634 gaskind Lockport, IL 60441		Generator's Site Address (if different than mailing address)											
GENERATOR		6. Transporter 1 Company Name TURN-KAY						U.S. EPA ID Number ILR000144500							
		7. Transporter 2 Company Name						U.S. EPA ID Number							
DESIGNATED FACILITY		8. Designated Facility Name and Site Address Ortek 7501 W. 47th Street McCook, IL 60525 USA						U.S. EPA ID Number ILD000645726							
		Facility's Phone: 708-762-5117													
TRANSPORTER		9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity		12. Unit Wt./Vol.		13. Waste Codes	
		1.								3500					
		2.													
		3.													
		4.													
INTERNATIONAL		14. Special Handling Instructions and Additional Information <div style="text-align: center; font-size: 2em; margin-top: 20px;">96760</div>													
		15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.													
		Generator's/Offor's Printed/Typed Name Daniel Andujar													
		Signature <i>[Signature]</i> Month Day Year 10 05 11													
		16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____													
TRANSPORTER		17. Transporter Acknowledgment of Receipt of Materials													
		Transporter 1 Printed/Typed Name Mark HANRAHAN						Signature <i>[Signature]</i> Month Day Year 10 05 11							
		Transporter 2 Printed/Typed Name						Signature Month Day Year							
ALTERNATE FACILITY		18. Discrepancy													
		18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection													
		Manifest Reference Number: _____ U.S. EPA ID Number _____													
		18b. Alternate Facility (or Generator) Facility's Phone: _____													
		18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____													
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)															
1.				2.				3.				4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a															
Printed/Typed Name Robert Kolac												Signature <i>[Signature]</i>		Month Day Year 10 5 11	

P₉₁

DAILY RECEIVING LOG USED OILS

TANK# 101 DATE/TIME OPENED 10-5-11 OPENED BY _____
GALLONS @ OPENING _____

	GENERATOR	LOAD#	TICKET #	DATE\TIME	GALLONS	PCBs	H2O	CL
1.	ARTCO	1	96754 96755	10-5-11	3975		7	.0185
2.	ARTCO	2	96754	10-5-11	3952		7	.0182
3.	ARTCO	3	96755	10-5-11	3998		7	.0290
4.	GP	4	96756	10-5-11	1600		6	.0188
5.	NB	5	96757	10-5-11	5400		6	.0143
6.	WILKIE LAR	6	96758	10-5-11	2500		7	.0186
7.	FORUM	7	96759	10-5-11	5500		7	

TOTAL GALLONS IN TANK AT CLOSING _____ DATE AND TIME TANK CLOSED _____

TANK CLOSED AND SECURED BY _____ TANK AGITATED BY _____ TANK SAMPLED BY _____

SUPERVISOR PAPERWORK AND SECURITY SIGN-OFF _____

LABORATORY

SUPERVISOR SIGN-OFF FROM PLANT YES _____ NO _____

CAN ACCOUNT FOR ALL TRUCK SAMPLES INCLUDED ON DAILY LOG YES _____ NO _____

INDIVIDUAL SAMPLES RUN FOR PCB'S YES _____ NO _____

ACCEPTABLE FOR REFINERY FEEDSTOCK YES _____ NO _____

IF ACCEPTABLE AUTHORIZED BY _____ DATE/TIME _____

PLANT

	GALS.OF	TO	FROM	TIME
	_____	_____	_____	TO _____
	_____	_____	_____	TO _____
	_____	_____	_____	TO _____

TANK EMPTY ON DATE _____ TIME _____ OPERATOR _____

Pg 2

DAILY RECEIVING LOG USED OILS

TANK# 101 DATE/TIME OPENED 10-5-11 OPENED BY _____
 GALLONS @ OPENING _____

	GENERATOR	LOAD#	TICKET #	DATE\TIME	GALLONS	PCBs	H2O	CL
1.	ITP	8	96760	10-5-11	3500		9	.7650
2.	ARTCO	9	96761	10-5-11	5995		7	0129
3.	THOMAS ENR	10	96762	10-5-11	2450		7	0690
4.								
5.								
6.								
7.								

TOTAL GALLONS IN TANK AT CLOSING _____ DATE AND TIME TANK CLOSED _____

TANK CLOSED AND SECURED BY _____ TANK AGITATED BY _____ TANK SAMPLED BY _____

SUPERVISOR PAPERWORK AND SECURITY SIGN-OFF _____

LABORATORY

SUPERVISOR SIGN-OFF FROM PLANT YES _____ NO _____

CAN ACCOUNT FOR ALL TRUCK SAMPLES INCLUDED ON DAILY LOG YES _____ NO _____

INDIVIDUAL SAMPLES RUN FOR PCB'S YES _____ NO _____

ACCEPTABLE FOR REFINERY FEEDSTOCK YES _____ NO _____

IF ACCEPTABLE AUTHORIZED BY _____ DATE/TIME _____

PLANT

	GALS.OF	TO	FROM	TIME
	GALS.OF	TO	FROM	TO
	GALS.OF	TO	FROM	TO

TANK EMPTY ON DATE _____ TIME _____ OPERATOR _____

10/5

10/4/2011 4:01am

10/5/2011 4:11am

W/O S-CL GIO

Last restandardised 8/18/2011 2:14pm

OXFORD LAB-X 3000

ANALYSIS REPORT

10/5/2011 4:11am

Calibration title: W/O S-CL GIO

Sample: 96748

S CL

5918 cps 4461 cps

Sample 96748 = -0.0796 % S

= 0.0184 % CL

OXFORD LAB-X 3000

ANALYSIS REPORT

10/5/2011 4:15am

Calibration title: W/O S-CL GIO

Sample: 96754

S CL

5930 cps 4463 cps

Sample 96754 = -0.0787 % S

= 0.0182 % CL

OXFORD LAB-X 3000

ANALYSIS REPORT

10/5/2011 4:19am

Calibration title: W/O S-CL GIO

Sample: 96755

S CL

6210 cps 4994 cps

Sample 96755 = -0.0586 % S

= 0.0296 % CL

OXFORD LAB-X 3000

ANALYSIS REPORT

10/5/2011 4:23am

Sample 96755 = -0.0586 % S
= 0.0296 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/5/2011 4:23am

Calibration title: W/O S-CL GIO

Sample: 96756

S CL

7541 cps 5415 cps

Sample 96756 = 0.0367 % S
= 0.0188 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/5/2011 4:30am

Calibration title: W/O S-CL GIO

Sample: 96758

S CL

6185 cps 4946 cps

Sample 96758 = -0.0604 % S
= 0.0286 % CL

W/O S-CL GIO Restandardisation

OXFORD LAB-X 3000
ANALYSIS REPORT

10/5/2011 4:34am

Calibration title: W/O S-CL GIO

Sample: 96757

S CL

5922 cps 4345 cps

Sample 96757 = -0.0793 % S
= 0.0148 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/5/2011 4:38am

Calibration title: W/O S-CL GIO

Sample: 96759

S CL

5839 cps 4091 cps

ANALYSIS REPORT

10/5/2011 4:38am

Calibration title: W/O S-CL 610

Sample: 96759

S CL

5839 cps 4091 cps

Sample 96759 = -0.0052 % S

= 0.0006 % CL

OXFORD LAB-X 3000

ANALYSIS REPORT

10/5/2011 4:41am

Calibration title: W/O S-CL 610

Sample: 96760

S CL

10787 cps 25736 cps

Sample 96760 = 0.2694 % S

= 0.7650 % CL

OXFORD LAB-X 3000

ANALYSIS REPORT

10/5/2011 4:45am

Calibration title: W/O S-CL 610

Sample: 96762

S CL

5846 cps 4239 cps

Sample 96762 = -0.0048 % S

= 0.0129 % CL

OXFORD LAB-X 3000

ANALYSIS REPORT

10/5/2011 4:51am

Calibration title: W/O S-CL 610

Sample: 96762

S CL

6764 cps 6529 cps

Sample 96762 = -0.0189 % S

= 0.0690 % CL

DAILY RECEIVING LOG USED OILS

TANK# 101 DATE/TIME OPENED 10-12-11 OPENED BY _____
 GALLONS @ OPENING _____

	GENERATOR	LOAD#	TICKET #	DATE\TIME	GALLONS	PCBs	H2O	CL
1.	ARTCO	1	96809	10-12-11	3970		7	.0067
2.	ARTCO	2	96811	10-12-11	3995		7	.0243
3.	NB	3	96814	10-12-11	5700		7	.0106
4.	ARTCO	4	96815	10-12-11	3960		7	.0070
5.	Future	5	96816	10-12-11	600		7	.0689
6.	Switch over	6	96817	10-12-11	2900		8	
7.	NB	7	96918	10-12-11	5500		8.7	

TOTAL GALLONS IN TANK AT CLOSING _____ DATE AND TIME TANK CLOSED _____

TANK CLOSED AND SECURED BY _____ TANK AGITATED BY _____ TANK SAMPLED BY _____

SUPERVISOR PAPERWORK AND SECURITY SIGN-OFF _____

LABORATORY

SUPERVISOR SIGN-OFF FROM PLANT YES _____ NO _____

CAN ACCOUNT FOR ALL TRUCK SAMPLES YES _____ NO _____
 INCLUDED ON DAILY LOG

INDIVIDUAL SAMPLES RUN FOR PCB'S YES _____ NO _____

ACCEPTABLE FOR REFINERY FEEDSTOCK YES _____ NO _____

IF ACCEPTABLE AUTHORIZED BY _____ DATE/TIME _____

PLANT**TIME**

_____ GALS.OF _____	TO _____	FROM _____	TO _____
_____ GALS.OF _____	TO _____	FROM _____	TO _____
_____ GALS.OF _____	TO _____	FROM _____	TO _____

TANK EMPTY ON DATE _____ TIME _____ OPERATOR _____

10/12

DAILY RECEIVING LOG USED OILS

TANK# 101 DATE/TIME OPENED 10-12-11 OPENED BY _____
 GALLONS @ OPENING _____

	GENERATOR	LOAD#	TICKET #	DATE\TIME	GALLONS	PCBs	H2O	CL
1.	<u>hazen tech</u>	<u>8</u>	<u>96819</u>	<u>10-12-11</u>	<u>4800</u>		<u>7</u>	<u>.3288</u>
2.	<u>NB multi</u>	<u>9</u>	<u>96820</u>	<u>10-12-11</u>	<u>1850</u>		<u>7</u>	<u>.0307</u>
3.	<u>HAZ multi</u>	<u>10</u>	<u>96821</u>	<u>10-12-11</u>	<u>850</u>		<u>7</u>	<u>.1935</u>
4.	<u>NB</u>	<u>11</u>	<u>96822</u>	<u>10-12-11</u>	<u>5000</u>		<u>7</u>	<u>.0602</u>
5.	<u>NB</u>	<u>12</u>	<u>96823</u>	<u>10-12-11</u>	<u>4000</u>		<u>7</u>	<u>.0168</u>
6.								
7.								

TOTAL GALLONS IN TANK AT CLOSING _____ DATE AND TIME TANK CLOSED _____
 TANK CLOSED AND SECURED BY _____ TANK AGITATED BY _____ TANK SAMPLED BY _____
 SUPERVISOR PAPERWORK AND SECURITY SIGN-OFF _____

LABORATORY

SUPERVISOR SIGN-OFF FROM PLANT YES _____ NO _____
 CAN ACCOUNT FOR ALL TRUCK SAMPLES INCLUDED ON DAILY LOG YES _____ NO _____
 INDIVIDUAL SAMPLES RUN FOR PCB'S YES _____ NO _____
 ACCEPTABLE FOR REFINERY FEEDSTOCK YES _____ NO _____
 IF ACCEPTABLE AUTHORIZED BY _____ DATE/TIME _____

PLANT

	GALS.OF	TO	FROM	TIME
				TO
				TO
				TO

TANK EMPTY ON DATE _____ TIME _____ OPERATOR _____

10/12

S CL
8422 CPS 14653 CPS

Sample 96819 = 0.0999 % S
= 0.3200 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/12/2011 7:15pm

Calibration title: W/O 5-CL GIO

Sample: 96820

S CL
5900 CPS 4902 CPS

Sample 96820 = -0.0752 % S
= 0.0307 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/12/2011 7:20pm

Calibration title: W/O 5-CL GIO

Sample: 96821

S CL
9749 CPS 11291 CPS

Sample 96821 = 0.1950 % S
= 0.1935 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/12/2011 7:25pm

Calibration title: W/O 5-CL GIO

Sample: 96822

S CL
6308 CPS 6167 CPS

Sample 96822 = -0.0315 % S
= 0.0602 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/12/2011 7:29pm

Calibration title: W/O 5-CL GIO

Sample: 96823

S CL
6125 CPS 4529 CPS

Sample 96814 = -0.0752 % S
= 0.0106 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/12/2011 6:47pm

Calibration title: W/O S-CL 610

Sample: 96815

S CL

5831 cps 4934 cps

Sample 96815 = -0.0859 % S
= 0.0070 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/12/2011 6:51pm

Calibration title: W/O S-CL 610

Sample: 96816

S CL

7972 cps 7116 cps

Sample 96816 = 0.0676 % S
= 0.0089 % CL

OXFORD LAB-X 3000
ANALYSIS REPORT

10/12/2011 6:57pm

Calibration title: W/O S-CL 610

Sample: 96817

S CL

12468 cps 22958 cps

Sample 96817 = 0.3999 % S
= 0.6626 % CL

OXFORD LAB-X 3000

UNIFORM WASTE MANIFEST		1. Generator ID Number 0316005284	2. Page 1 of	3. Emergency Response Phone (630)529-0240	4. Manifest Tracking Number 008751568 JJK
5. Generator's Name and Mailing Address SWITCH CRAFT 5555 N. ELSTON CHICAGO, IL			Generator's Site Address (if different than mailing address)		
6. Transporter 1 Company Name North Branch Environmental			UPM0350461IL		U.S. EPA ID Number ILR000052977
7. Transporter 2 Company Name					U.S. EPA ID Number
8. Designated Facility Name and Site Address Orteck 7601 W. 47th street McCook, IL 60525			(708)762-5119		U.S. EPA ID Number 0311740001
Facility's Phone:					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity
		1. Non-Hazardous Liquid	001	W	2900
		2.			
		3.			
		4.			
13. Waste Codes					
14. Special Handling Instructions and Additional Information <div style="text-align: right;">Work order 95754</div>					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offor's Printed/Typed Name JASON HICKS			Signature <i>Jason Hicks</i>		Month Day Year 10 12 11
TRANSPORTER	16. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:		
	Transporter signature (for exports only):				
	17. Transporter Acknowledgment of Receipt of Materials				
Transporter 1 Printed/Typed Name SCOTT SCHAEFER			Signature <i>Scott Schaefer</i>		Month Day Year 10 12 11
Transporter 2 Printed/Typed Name			Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	Manifest Reference Number:				
	18b. Alternate Facility (or Generator) U.S. EPA ID Number				
	Facility's Phone:				
18c. Signature of Alternate Facility (or Generator)					
Month Day Year					
19. Waste Report Management Method Codes (i.e., codes for waste treatment, disposal, and recycling systems)					
1.		2.		3.	
20. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name Juan Garcia			Signature <i>Juan Garcia</i>		Month Day Year 10 12 11



Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0059

UNIFORM WASTE MANIFEST		1. Generator ID Number 96819	2. Page 1 of 1	3. Emergency Response Phone 800-438-1930	4. Manifest Tracking Number 000413554WAS		
5. Generator's Name and Mailing Address L. J. SANTOCCO, INC. 2225 PROTERO ROAD BIRMINGHAM, AL 35203 Generator's Phone: 205-968-7222							
Generator's Site Address (if different than mailing address)							
6. Transporter 1 Company Name MACHEN Environmental Corporation					U.S. EPA ID Number ILD084785253		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address DORR, INC. 7021 S. ALLEN STREET MADISON, TN 37050 Facility's Phone: 731-761-3117					U.S. EPA ID Number TLD00240788		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
				No.	Type		
	1. 100% Aqueous, Not Regulated Water (Water)			100		4800	
	2.						
	3.						
4.							
14. Special Handling Instructions and Additional Information 96819							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name ISRAEL SANTIAGO			Signature 		Month Day Year 10/12/11		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name C. J. Davis			Signature 		Month Day Year 10/12/11		
Transporter 2 Printed/Typed Name			Signature 		Month Day Year		
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)						U.S. EPA ID Number	
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Juan Garcia			Signature JUAN G		Month Day Year 10/12/11		

ATTACHMENT N

Ortek Storage Tanks Inventory

PG 1 ORTEK STORAGE TANKS INVENTORY CURRENT January 30,2012

TANK #	PRODUCT STORED	CAPACITY	INVENTORY
D-1	NOT IN SERVICE	15,000	0
D-2	NOT IN SERVICE	15,000	0
1	OILY WASTE EMULSIONS	15000	0
2	OILY WASTE EMULSIONS	15,000	0
3	OILY WASTE EMULSIONS	15,000	0
4	OILY WASTE EMULSIONS	21,300	7,000
5	OILY WASTE EMULSIONS	21,300	10,000
6	OILY WASTE EMULSIONS	21,300	8,000
7	FUTURE USED OIL	28,770	0
8	FUTURE USED OIL	28,770	5000
9	NOT IN SERVICE	28,770	0
10	NOT IN SERVICE	28,770	0
20	NOT IN SERVICE	8,000	0
98	NOT IN SERVICE	21,300	0
99	NOT IN SERVICE	21,300	0
100	OILY WATER	250,000	125000
101	OILY WATER	250,000	50,000
110	NOT IN SERVICE	15,000	0
120	#5 FUEL OIL - WET	21,300	4,000
121	#5 FUEL OIL - WET	21,300	9,500
122	#5 FUEL OIL - DRY	21,300	0
123	USED OIL	21,300	0
124	#5 FUEL OIL - WET	21,300	19,400
125	USED OIL	21,300	0
126	OILY WASTE EMULSIONS	21,300	8,000
127	OILY WASTE EMULSIONS	21,300	15500
128	WATER SOLUBLE	21,300	3,100
129	WATER SOLUBLE	21,300	13,900
130	USED OIL	21,300	0
131	USED OIL	21,300	0
132	OILY WASTE EMULSIONS	21,300	10,200

store
processing
in env oil
of

transported
transported

transported

from 101
1
from 101
1

101 from 101

PG 2 ORTEK STORAGE TANKS INVENTORY CURRENT January 30, 2012

TANK #	PRODUCT STORED	CAPACITY	INVENTORY
133	USED OIL	21,300	18,500
143	NOT IN SERVICE	21,300	17000
144	NOT IN SERVICE	21,300	15000
145	#5 FUEL OIL - WET	21,300	0
146	#5 FUEL OIL - DRY	21,300	0
201	FLUSHING OIL	1,500	0
204	NOT IN SERVICE	2,100	0
205	NOT IN SERVICE	2,100	0
207	SJR 2000	2,750	0
208	SJR 2000	2,750	0
210	SJR 2000	2,750	0
211	H CAL 2400	2,750	0
212	H CAL 2400	2,750	0
213	ELCO 102 BLEND	2,750	0
214	NIS	2,750	0
215	EXXON 80 NEUTRAL	2,750	0
216	ELCO 102 BLEND	2,750	0
217	RIGID DARK TANK	2,750	0
237	INFINEUM 4540	6,200	0
238	IPC 1500	6,200	0
240	SK 150 NEUTRAL	19,900	0
241	ORTEK BASE OIL-150	10,500	0
242	INFINEUM SL P 5066	12,000	0
250	BLENDING TANK	7,500	0
251	BRANNEN SJ	6,200	0
252	IPC 1500	10,500	0
253	BLEND TANK	12,000	0
307	NOT IN SERVICE	21,300	0
300	OUTSIDE FLUSHING OIL	3,170	2300
310	ASPHALT	21,300	0

sideing
long time
future?
of somebody
tlj
?
?
Blending
tank
inside
Bldg

PG 3 ORTEK STORAGE TANKS INVENTORY CURRENT January 30, 2012

TANK #	PRODUCT STORED	CAPACITY	INVENTORY
316	T-1/T-2 LIGHT FUEL	15,500	0
323	LIGHT FUEL - API	21,300	12000
324	OILY WASTE EMULSIONS	21,300	0
325	OILY WASTE EMULSIONS	21,300	0
326	NOT IN SERVICE	21,300	0
400	NOT IN SERVICE	250,000	225000
402	ORTEK BASE OIL-150	21,300	0
403	USED OIL	21,300	18000
404	ORTEK BASE OIL-150	24,500	0
405	NOT IN SERVICE	24,500	0
408	CONOCO/CITGO LW	21,300	0
409	USED OIL	21,300	0
410	GLYCOL	21,300	4000
411	GLYCOL	21,300	6000
412	ORTEK BASE OIL-150	21,300	0
413	ORTEK BASE OIL-150	21,300	0
500	BASE OIL	19,400	0
501	BASE OIL	19,400	0
502	BASE OIL	19,400	0
503	BASE OIL	19,400	0
504	BASE OIL	19,400	0
505	BASE OIL	21,300	0
506	BASE OIL	21,300	0
507	BASE OIL	19,400	0
508	BASE OIL	19,400	0
509	BASE OIL	19,400	0
510	BLENDED PRODUCT	14,800	0
511	BLENDED PRODUCT	14,800	0
512	BLENDED PRODUCT	14,800	0
513	BLENDED PRODUCT	14,800	0
514	ALUM SULFATE	4,440	1500
515	CAUSTIC - 50%	4,050	1700
NP 6	ORTEK BASE OIL-150	5,800	0
NP 7	ORTEK BASE OIL-150	5,800	0
DT 40	NOT IN SERVICE	5,800	0
T-1 TOWER	NOT IN SERVICE	10,600	0
T-2 TOWER	USED OIL DISTILLATION	13,380	6,500
T-3 TOWER	NOT IN SERVICE	13,380	0
T-4 TOWER	WET OIL DRYING	13,380	0
T-5 TOWER	NOT IN SERVICE	13,380	0
T-6 TOWER	NOT IN SERVICE	13,380	0

corrected
for tank
Tester

Feed
tank distillate
Tester

Crock case oil
dipped
1

LAND AND CHEMICALS DIVISION

Type of Document: Information Request 3007

Name of Document: Ortek, Inc. ILD000646786

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>Brian Kennedy</u>	<u>9/7/12</u>
SECTION APA:	<u>Wen B. Crip</u>	<u>9/10/12</u>
SECTION CHIEF:	<u>[Signature]</u>	<u>9/10/12</u>
BRANCH APA:	<u></u>	<u></u>
BRANCH CHIEF:	<u></u>	<u></u>
DIVISION APA:	<u></u>	<u></u>
DIVISION DIRECTOR:	<u></u>	<u></u>
OTHERS:	<u>Att. Bob Peachey (see attached email)</u>	<u>9/6/12</u>
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DRA:	<u></u>	<u></u>
RA:	<u></u>	<u></u>
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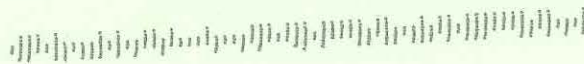


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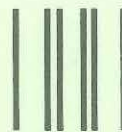
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DIVISION FRONT OFFICE

SEP 14 2012

LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Received by (Please Print Clearly) B. Date of Delivery 9-8-13	
1. Article Addressed to:		C. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
Mr. Lowell Aughenbaugh/ President Ortek, Inc. 7601 West 47th Street McCook, IL 60525		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Transfer from service label)		3. Service Type	
7009 1680 0000 7679 6101		<input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
PS Form 3811, March 2001		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
Domestic Return Receipt		102595-01-M-1424	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to:		B. Received by (Printed Name) C. Date of Delivery 9/12/12	
 Robert Kolar Inc 7. 47th Street k, IL 60525		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Transfer from service label)		3. Service Type	
7009 1680 0000 7669 2502		<input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
PS Form 3811, February 2004		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
Domestic Return Receipt		102595-02-M-1540	



Re: Ortek/RS: Marked-up 3007s
Robert Peachey to: Brian Kennedy

09/06/2012 05:00 PM

Yes, by this e-mail (and contingent on my edits) I give ORC concurrence on both requests. Thanks, Brian!

--Bob

Robert M. Peachey
Office of Regional Counsel
U.S. EPA Region 5 (C-14J)
77 W. Jackson Blvd.
Chicago, Illinois 60604
Phone: (312) 353.4510
Fax: (312) 692.2422

The preceding email message may contain information that is privileged or otherwise exempt from disclosure under applicable law. Do not disclose without consulting Office of Regional Counsel. If you have received this message in error, please do not read it, reply to the sender that you have received it in error, and erase or otherwise destroy the message.

Brian Kennedy Thanks, Bob. I'll make these corrections; can I u... 09/06/2012 02:52:12 PM

From: Brian Kennedy/R5/USEPA/US
To: Robert Peachey/R5/USEPA/US@EPA,
Date: 09/06/2012 02:52 PM
Subject: Re: Ortek/RS: Marked-up 3007s

Thanks, Bob. I'll make these corrections; can I use this email as your concurrence on both information requests?

Brian Kennedy
Environmental Engineer
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Compliance Section #2
Phone: (312)-353-4383

Robert Peachey Dear Brian: Here are the marked-up 3007s for O... 09/05/2012 05:21:15 PM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 10 2012

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7669 2502
RETURN RECEIPT REQUESTED

Mr. Robert Kolar
Project Manager
Ortek, Inc.
7601 West 47th Street
McCook, Illinois 60525

Re: Request for Information
EPA ID No.: ILD000646786

Dear Mr. Kolar:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Ortek, Inc. (hereinafter "Ortek" or "facility") to submit certain information relating to Ortek's used oil management procedures at its facility located at 7601 West 47th Street in McCook, Illinois. We are requiring this information to determine the facility's compliance status with the provisions of RCRA as delineated in the authorized Illinois Administrative Code (IAC), and the United States Code of Federal Regulations (CFR); specifically, those regulations related to the standards for used oil processors set forth in Subpart F of 35 IAC § 739 [Subpart F of 40 CFR § 279]. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the U.S. Environmental Protection Agency, Attention: Michael Beedle, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will not disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

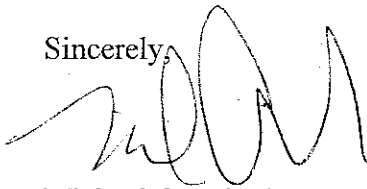
Ortek must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Ortek to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Michael Beedle at 312-353-7922.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Cunningham', written over a horizontal line.

Michael Cunningham, Acting Chief
Compliance Section 2
RCRA Branch

Enclosure

cc: Anna VanOrden, IEPA – Des Plaines District Office (anna.vanorden@illinois.gov)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

REQUESTS:

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked for, at, or under the direction of Ortek.

Management of Incoming Oils and Wastes

2. Provide a comprehensive list of all generators and transporters (customers) which send Ortek used oil and oily wastewaters.
3. Provide copies of the most recent Waste Analysis Plan and Material Profile Sheet used for incoming materials.
4. Provide a copy of the most recent Spill Prevention, Control and Countermeasure Plan.
5. Provide the most recent version of Ortek's Storage Tank Inventory, including the product stored in each tank, the source of the material, and the current volume of material in each tank.
6. Please provide any other documentation or forms used by Ortek to analyze incoming used oil, wastewaters and oily wastes including, but not limited to, any waste profile forms completed by the generators and transporters of the materials.
7. Please provide a detailed written description of the procedure Ortek follows to obtain representative samples from incoming waste streams, how those samples are prepared for analysis under SW-846 Method 9075 (XRF) to determine total halogen content, which types of waste streams are tested using Method 9075, how Ortek determines which wastes need to be tested, and how analytical results are interpreted based on instrumental results. Describe the method or procedure that Ortek follows when used oil tests greater than 1000 ppm halogens to rebut the presumption the used oil is mixed with hazardous waste.
8. Provide a written description of the management and analysis of oily wastewaters received by Ortek before they are dehydrated in Tanks 1-6. Also describe how, after oily wastewaters are consolidated and the phases separated, Ortek manages and analyzes oil

skimmed from this process.

9. Describe the frequency Ortek uses bottom-sediment and water (BSW) centrifugal analysis on incoming waste streams, how the results are interpreted and how wastes are managed after analysis.
10. Please provide documentation or a written description of the materials currently present in the grease shack, including any remaining chemical containers and, if applicable, the contents of all containers. Describe whether or not the material in each container is still usable, approximately how long it has been in storage, and planned use or disposal of the material

RS Used Oil Shipments

11. Provide all manifests, bills of lading, analytical records, land disposal restrictions or used oil logs regarding the five shipments of material received through RS Used Oil in or around April 2011 and May 2011. Provide a written description of the material in each shipment, the tanks in which each shipment was stored, and when and where the shipments were taken off-site.
12. Identify the generator(s) of the material received from RS Used Oil in or around April 2011 and May 2011.
13. Provide all manifests, bills of lading, analytical records, land disposal restrictions or used oil logs regarding the material shipped off-site from Ortek Tanks 120, 122 and 146 on November 1, 2, 7-11, and 14, 2011. Also provide a written explanation why the materials shipped off-site on those dates were determined "off-spec" and any analytical records to support that determination.
14. Identify all end-users (customers) or TSDFs which received the material shipped off-site on November 1, 2, 7-11 and 14, 2011.
15. Please provide all information, documents or correspondence regarding RS Used Oil's October 7, 2011 application for a RCRA Subtitle C Identification Number as a Large Quantity Generator of hazardous waste using Ortek's site address as the point of generation.

July 2011 Sample Analytical Results

16. Provide any manifests, bills of lading, used oil logs or additional analytics or documents regarding the "WO 4, 5, 6, 101" material sent for analysis at Precision Petroleum Labs, Inc. on July 8, 2011. Identify the generator and transporter of the material, the tanks in which it was stored, and when and where it was shipped off-site.

17. Provide any manifests, bills of lading, used oil logs or additional analytics or documents regarding the "Glycol 324, 325, 410, 411" material sent for analysis at Precision Petroleum Labs, Inc. on July 8, 2011. Identify the generator and transporter of the material, the tanks in which it was stored, and when and where it was shipped off-site.

October 2011 Used Oil Shipments

18. Please provide any additional documents, analytical results or bills of lading for the October 5, 2011 shipment of 3,500 gallons of used oil from International Titanium Powder to Ortek. Identify the tank in which the used oil was stored, and when and where it was shipped off-site.
19. Provide any additional documents, analytical results or bills of lading for the October 12, 2011 shipments of 4800 gallons of "non-hazardous water" from Laser Technology, 2900 gallons of "non-hazardous liquid" from Switch Craft, and 850 gallons of material from HazChem to Ortek. Identify the tanks in which the materials were stored, and when and where they were shipped off-site.

Future Environmental, Inc.

20. Please provide any manifests or bills of lading, analytical records and any additional documents regarding the used oil stored in Tank 400 by Future Environmental. Also provide a written description stating how long Future Environmental has been storing oil in Tank 400.
21. Identify the most recent date Future Environmental added oil to Tank 400. If Future Environmental has continued to add oil to the tank, describe how often this occurs.
22. Provide a written description of the used oil drop-off and pick-up routine by Future Environmental in Ortek Tanks 7 and 8. Identify how often this process occurs, the average volume of oil stored at any given time, and provide any manifests, bills of lading and analytical records of the oil.

Illinois Recovery Group, Inc.

23. Provide any manifests, bills of lading, and analytical records regarding a pickup of used oil from Ortek by Illinois Recovery Group on December 9, 2011.

Certification

24. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of

documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

-End of Requests-



ENVIROPUR
WASTE REFINING AND TECHNOLOGY, INC.

7601 West 47th Street
McCook, Illinois 60525
(708) 442-6000 ♦ Fax (708) 442-6027

VIA FACSIMILE AND U.S. MAIL

November 2, 1995

RECEIVED

NOV - 6 1995

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Re: Manifest Discrepancy Report/Unmanifested Waste Report
Enviropur Waste Refining and Technology, Inc.
U.S. EPA Identification No: ILD000646786

Dear Administrator Adamkus:

Enviropur Waste Refining and Technology, Inc. (Enviropur) is making this report pursuant to Chapter 40 of the Code of Federal Regulations, Sections 761.210(b) and 761.211(c). This report concerns the improperly manifested delivery to our facility of one load of "used oil" contaminated with polychlorinated biphenyls (PCBs) on October 20, 1995. The circumstances surrounding the delivery of this material and the actions Enviropur has taken since our discovery are described below.

On October 20, 1995, Duke's Oil Service, Incorporated (Duke's) delivered to Enviropur, via Uniform Waste Manifest, approximately 5500 gallons of liquid waste described as "non-hazardous used oil" (See Waste Manifest, Attachment A). Duke's, as can be seen on Attachment A, was the transporter, as well as the generator of the "used oil".

Once at the Enviropur facility, a representative sample of the "used oil" was obtained from Duke's bulk tanker, and the tanker was subsequently unloaded into one of Enviropur's holding tanks. Enviropur tested this sample in its laboratory and found Polychlorinated Biphenyls (PCB's), specifically Aroclor 1248, at a concentration of 374 parts per million (ppm). For confirmation, Enviropur sent an aliquot of the sample obtained from the tanker, to an independent laboratory for analysis. The laboratory reported that Duke's "used oil" contained Polychlorinated Biphenyls, specifically Aroclor 1248, at a concentration of 400

Mr. Valdas V. Adamkus
November 2, 1995
Page 2

parts per million.

We have communicated to Duke's, in writing, the results of our analyses and have requested that the contents be promptly removed from our facility for proper treatment/disposal.

Should you have any questions regarding this matter please do not hesitate to call me at (708) 442-6000, extension 1241.

Sincerely,


Francis J. Lappin
Operations Manager

cc: Duke's Oil Service
783 Fairway Drive
Bensenville, Il. 60106

Mary Gade, Director
Illinois EPA
2200 Churchill Rd.
Springfield, Il. 62794

enclosures

ATTACHMENT A



PLEASE TYPE

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-89)

Form Approved. OMB No. 2050-0839, Expires 9-30-96

UNIFORM WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law, but is required by Illinois law.
3. Generator's Name and Mailing Address DUKES OIL SERVICE, INC. 783 FAIRWAY DRIVE - BENSENVILLE, IL 60106		Location If Different		A. Illinois Manifest Document Number IL 6881170 B. Illinois Generator's ID 0124113000 C. Illinois Transporter's ID 312-625-6996 D. (312) 625-6996 E. Illinois Transporter's ID 111111 F. () G. Illinois Facility's ID 0311749902 H. Facility's Phone (708) 442-6000	
4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* 312-625-6996		6. US EPA ID Number IL 0000307785		D. (312) 625-6996	
5. Transporter 1 Company Name DUKE'S OIL SERVICE, INC.		8. US EPA ID Number		E. Illinois Transporter's ID 111111	
7. Transporter 2 Company Name		10. US EPA ID Number		F. () G. Illinois Facility's ID 0311749902	
9. Designated Facility Name and Site Address ENVIROPUR WASTE REFINING & TECH. 7601 WEST 47th STREET MCCOOK, IL 60525		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		H. Facility's Phone (708) 442-6000	
		12. Containers		13. Total Quantity	
		No. Type		Unit Wt/Vol	
a. USED OIL NON-HAZARDOUS		0-0-1 TT		055.00 G	
b. WASTE WATER		0-0-1 TT		G	
c.					
d.					
J. Additional Description for Materials Listed Above NON-HAZARDOUS		K. Handling Codes for Wastes Listed Above in item #14			
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and selected the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Fred Colon		Signature Fred Colon		Date 10/20/95	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Fred Colon		Date 10/20/95	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of materials covered by this manifest except as noted in item 19.		Signature RICH GENTRY		Date 10/20/95	

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1001 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 2. TSD MAIL TO IEPA
(RCRA AND PCB WASTES)

In case of a spill call the Illinois Office of Emergency Response at 217 / 782-7860 and the National Response Center at 800 / 424-9802 or 102 / 426-2675.

JUN 13 1996

DRE-8J

Enviropur
7601 W 47th Street
McCook, Illinois 60525

Re: New Federal Regulations on the
Import/Export of Hazardous Waste
Enviropur
ILD 000 646 786

Dear Sir/Madame:

I have enclosed a photo copy of the April 12, 1996, FEDERAL REGISTER, "Imports and Exports of Hazardous Waste: Implementation of OECD Council Decision, Final Rule." By July 11, 1996, persons involved in importing/exporting hazardous waste must be in compliance with the regulations published in the enclosed requirements which address the control of transfrontier movements of waste destined for recovery operations. These new requirements, promulgated under the authority of the Resource Conservation and Recovery Act as amended (RCRA), apply in all States, irrespective of States' RCRA authorization status.

If you have any questions regarding this Final Rule please contact the RCRA Hot Line 1-800-424-9346 or TDD 1-800-553-7272 (for the hearing impaired). In addition, selected supporting materials are available on the Internet. The April 12, 1996, FEDERAL REGISTER has instructions to access the information electronically.

Sincerely yours,

ORIGINAL SIGNED BY
UYLAINE E. McMAHAN

Uylaine E. McMahan
Compliance Assistance Program Manager
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure



ENVIROPUR
WASTE REFINING AND TECHNOLOGY, INC.

WMD
file
7601 West 47th Street
McCook, Illinois 60525
(708) 442-6000 ♦ Fax (708) 442-6027

'94 NOV -7 AM 12:29

VIA FACSIMILE AND U.S. MAIL

REGIONAL ADMINISTRATOR
RECEIVED
WMD RECORD CENTER

DEC 15 1994

November 2, 1994

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Manifest Discrepancy Report/Unmanifested Waste Report
EnviroPur Waste Refining and Technology, Inc.
U.S. EPA Facility ID No. **ILD000646786**

Dear Administrator Adamkus:

While EnviroPur Waste Refining and Technology, Inc. (EnviroPur) is not a commercial storer or disposer of PCB waste, it has determined to make this report pursuant to Chapter 40 of the Federal Code of Federal Regulations, Sections 761.210(b) and 761.211(c). This concerns the improperly manifested delivery to our facility of one load of "water soluble oil" contaminated with polychlorinated biphenyls (PCBs) on October 24, 1994. The circumstances surrounding the delivery of this material and the actions EnviroPur has taken since their discovery are described below.

On October 24, 1994, Lasalle Rolling Mills, Incorporated (LRM) delivered to EnviroPur, via Uniform Waste Manifest, approximately 4230 gallons (5600 gallons per manifest) of liquid waste described as "Non-hazardous, Coolant, water soluble oil" (See Waste Manifest, Attachment A). LRM's waste was hauled to our facility via North Branch Environmental (North Branch).

Once at the EnviroPur facility, a representative sample of the waste was obtained from North Branch's bulk tanker, and the tanker was unloaded into EnviroPur's 21,500-gallon "day" holding tank. On that same day, EnviroPur tested this sample in its laboratory and found Polychlorinated Biphenyls (PCBs) at a concentration of 756 parts per million (ppm).

We have communicated to LRM and North Branch, in writing, the results of our analyses and have requested that the contents of the 21,500 gallon day tank be promptly removed from our facility for proper treatment/disposal (See Attachments B and C).

Should you require further information concerning Enviropur's efforts to date or future actions, please do not hesitate to call.

Sincerely,



Frank Lappin
Vice-President of Operations

Enclosures:

- cc: 1) Mary Gade, Director
Illinois EPA
2200 Churchill Rd.
Springfield, IL 62794
- 2) LaSalle Rolling Mills
1375 Ninth Street
LaSalle, IL 61301
- 3) North Branch Environmental
1629 South Roselle Rd
Schaumburg, IL 60172

ATTACHMENT A.



PLEASE TYPE

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-89)

Form Approved. OMB No. 2050-0039, Expires 9-30-94

UNIFORM WASTE MANIFEST		1. Generator's US EPA ID No. ILD022254080		Manifest Document No. 6	2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address LaSalle Rolling Mills, Inc. 1375 Ninth St., LaSalle, IL 61301					A. Illinois Manifest Document Number IL6302015 FEE PAID IF APPLICABLE			
4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* (815) 224-2174					B. Illinois Generator's ID 0990300009			
5. Transporter 1 Company Name Northbranch					C. Illinois Transporter's ID 0204			
6. US EPA ID Number					D. (708) 529-0240 Transporter's Phone			
7. Transporter 2 Company Name					E. Illinois Transporter's ID			
8. US EPA ID Number					F. () Transporter's Phone			
9. Designated Facility Name and Site Address Enviropur Waste Refining and Technology 7601 West 47th Street McCook, IL 60525					G. Illinois Facility's ID 0311740002			
10. US EPA ID Number ILD000646786					H. Facility's Phone (708) 442-6000			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Coolant, water soluable oil; Non-hazardous					No. 001	Type TT	05600G	EPA HW Number XX Authorization Number 000351
b.								EPA HW Number XX Authorization Number
c.								EPA HW Number XX Authorization Number
d.								EPA HW Number XX Authorization Number
J. Additional Description for Materials Listed Above					K. Handling Codes for Wastes Listed Above In Item #14 G = Gallons Y = Cubic Yards			
15. Special Handling Instructions and Additional Information Contact Person: Linda Corrie								
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.								
Printed/Typed Name Linda Corrie					Signature <i>Linda Corrie</i>		Date 10/21/94	
17. Transporter 1 Acknowledgement of Receipt of Materials					Signature <i>Tom Suerth</i>		Date 10/21/94	
Printed/Typed Name Tom Suerth					Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials					Signature		Date	
Printed/Typed Name					Signature		Date	
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.								
Printed/Typed Name R Gentry					Signature <i>R Gentry</i>		Date 10/24/94	

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

In case of a spill call the Illinois Office of Emergency Response at 217/782-7860 and the National Response Center at 800/424-8802 or 202/426-2675.

ATTACHMENT B

LaSalle's delivery of PCB wastes to Enviropur appears to have violated the following:

- I. Toxic Substance Control Act (15 U.S.C. 2601, et seq.).
 - A. Section 6(e) (2) of TSCA, 15 U.S.C. 2605(e) (2)
 - B. Section 15 of TSCA, 15 U.S.C. 2614
- II. Code of Federal Regulations, Title 40, Part 761
 - A. 761.40(e)
 - B. 761.40(h)
 - C. 761.45(a)
 - D. 761.60(a)
 - E. 761.79
 - F. 761.180(a)
 - G. 761.202(a)
 - H. 761.205(a) (2)
 - I. 761.207
 - J. 761.208
 - K. 761.209

ATTACHMENT C



ENVIROPUR
WASTE REFINING AND TECHNOLOGY, INC.

7601 West 47th Street
McCook, Illinois 60525
(708) 442-6000 ♦ Fax (708) 442-6027

VIA FACSIMILE AND U.S. MAIL

November 1, 1994

Ms. Linda Corrie
LaSalle Rolling Mills, Inc.
1375 Ninth Street
LaSalle, Ill. 61301

Re: Polychlorinated Biphenyl Contamination
Illinois EPA Manifest No. 6302015
Received by Enviropur on October 24, 1994

Dear Ms. Corrie:

The purpose of this letter is to memorialize the contents of our telephone conversation on October 26, 1994.

I informed you that on October 21, 1994, North Branch accepted from LaSalle Rolling Mills (LaSalle) approximately 5600 gallons of "coolant, water soluble oil; non-hazardous" (waste) on Illinois Manifest No. 6302015. (See Attachment A). North Branch transported this waste in tanker truck to Enviropur.

Enviropur received the waste from LaSalle, which was delivered by North Branch at 8:38 A.M. on October 24, 1994. Once at the Enviropur facility, a representative sample of the waste was taken from North Branch's trailer, analytically "fingerprinted" by our laboratory, with the exception, at this time, of polychlorinated biphenyls (PCBs). After fingerprinting, the waste was off-loaded into our 21,500 gallon "day" tank (Tank 325) where the waste was intermixed with other waste liquids. Later that evening, and prior to processing the contents of Tank 325, a PCB analysis was run on the contents of the tank. Finding PCBs present, we then ran a PCB analysis on each load accepted into Tank 325 on October 24, 1994. Our laboratory reported that LaSalle's waste contained polychlorinated biphenyls (PCBs), as defined at 40 CFR 761.3, in a concentration of 756 parts per million (ppm). LaSalle's wastes are now part of an determined volume of liquid waste stored, approximately 20,200 gallons, in Tank 325, at the Enviropur facility. The entire volume of waste is now regulated by the United States Environmental Protection Agency as a PCB containing waste pursuant to the Toxic Substance Control Act (40 CFR 761.1 (b)).

Ms. Linda Corrie
LaSalle Rolling Mills, Inc.
Page 2

Enviropur does not have a permit to store, treat or dispose of PCBs. Consequently, the PCBs must be promptly removed to, and managed at, an approved facility. Furthermore, all surfaces which are contaminated with PCBs must be decontaminated. As you are aware, these tasks are arduous and expensive. We firmly believe that performance of these tasks is LaSalle's responsibility.

Enviropur requests that LaSalle notify the undersigned by 10:00 A.M., Thursday, November 3, 1994, whether it will accept responsibility to perform or assure the performance of the following tasks:

1. The removal of the entire volume of PCB contaminated wastes to an approved disposal facility;
2. Decontamination of those surfaces contaminated with PCBs;
3. Removal of any wastes generated during the decontamination process to an approved PCB disposal facility; and,
4. The disposal of all such PCB wastes in a lawful manner.

We have ever confidence that LaSalle will step forward and assume this responsibility. LaSalle, however, must act quickly both to satisfy its statutory and regulatory obligations, and to restore Enviropur's tank to operation.

Finally, Enviropur is required to submit to U.S.EPA a written report concerning the receipt of LaSalle's unmanifested PCB waste. (See 40 CFR 761.211(c)). Please see Attachment B for a list of those sections of the TSCA statute and the regulations promulgated by U.S.EPA pursuant to TSCA, which LaSalle appears to have violated by delivering PCB wastes to Enviropur. Both LaSalle and Enviropur will be better off if Enviropur can demonstrate that LaSalle has removed the PCBs from our facility before submission of the unmanifested waste report.

Thank you, in advance, for your early consideration and response.

Ms. Linda Corrie
LaSalle Rolling Mills, Inc.
Page 3

Sincerely,

A handwritten signature in cursive script that reads "Frank Lappin".

Frank Lappin
Vice-President of Operations

FL/fjl

enclosures

cc: Mr. John Van Hosen - North Branch



ENVIROPUR
WASTE REFINING AND TECHNOLOGY, INC.

MAA

file
7601 West 47th Street
McCook, Illinois 60525
(708) 442-6000 ■ Fax (708) 442-6027

O: WMD
CC: RA/RE
LTR. ONLY

RECA

VIA FACSIMILE AND U.S. MAIL

RECEIVED
WMD RECORD CENTER

DEC 07 1994

September 13, 1994

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Manifest Discrepancy Report/Unmanifested Waste Report
Enviropur Waste Refining and Technology, Inc.
U.S. EPA Identification No.: ILD000646786

Dear Administrator Adamkus:

Enviropur Waste Refining and Technology, Inc. (Enviropur) is making this report pursuant to Chapter 40 of the Code of Federal Regulations, Sections 761.210(b) and 761.211(c). This report concerns the improperly manifested delivery to our facility of two loads of waste oil contaminated with polychlorinated biphenyls (PCBs) on August 29, 1994 and September 1, 1994. The circumstances surrounding the delivery of these materials and the actions Enviropur has taken since discovery of the PCB contamination are described below.

On August 29, 1994, Argonne National Laboratory (Argonne) shipped approximately 1,490 gallons of wastes described as "non-hazardous oil/water" to Enviropur. (See Attachment A). Argonne's wastes were hauled by Illinois Recovery Systems, Inc. (IRS). On September 1, 1994, IRS generated and shipped to Enviropur approximately 7,200 gallons of wastes also described as "non-hazardous oil/water." (See Attachment B).

Once at the Enviropur facility, these wastes were off-loaded into a 21,500 gallon holding tank where they were intermixed with other waste liquids. These wastes were then processed in our distillation unit and transferred to various holding tanks throughout the facility.

Enviropur sent samples of the Argonne wastes and the IRS wastes, all of which were obtained during our sampling protocol and prior to intermixing, to an independent laboratory for analysis.

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
September 13, 1994
Page 2

The laboratory reported to Enviropur on September 10, 1994 that Argonne's wastes contained PCBs, as defined at 40 CFR 761.3, in concentrations of 481.195 parts per million (ppm) and that the wastes which IRS shipped on September 1, 1994 contained PCBs in concentrations of 178.4 ppm.¹

Between September 6 and September 7, 1994, a volume of refined oil product containing PCBs was sent off-site. Enviropur has identified the persons to whom these materials were sent; notified these persons that the materials contain regulated substances; provided these persons with appropriate warning labels; initiated a recall of all contaminated materials; and has begun to make arrangements for the proper transportation and disposal of these materials.

Enviropur has also identified the extent of existing contamination at its facility; as of September 8, 1994, curtailed all off-site shipment of materials; and, has ceased operations at its facility until it can ensure that those portions of the facility brought back into operation are not contaminated or have been properly decontaminated. Furthermore, Enviropur has notified the generators of the PCB materials and sought their participation in the facility cleanup. (See Attachments C and D).

Enviropur will work with the United States Environmental Protection Agency and the Illinois Environmental Protection Agency (IEPA) to reduce any threat posed by these materials to human health or the environment. To this end, we have contacted members of your staff and IEPA to arrange an early meeting at which Enviropur will describe its plan of attack and seek the agencies' reactions and suggestions.

Should you require further information concerning Enviropur's efforts to date or future actions, please do not hesitate to call.

Sincerely,

Frank Lappin

Frank Lappin
Vice-President Plant Operations

¹ Subsequent laboratory analysis indicates that the Argonne wastes contain PCBs in concentrations of 519 ppm and the IRS wastes contain PCBs in concentrations of 26.4 ppm.

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
September 13, 1994
Page 3

FL:spk
Enclosures
cc. William Child, IEPA
Argonne National Laboratory
Illinois Recovery Systems, Inc.

ATTACHMENT A.



STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.O. BOX 19276

SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

State Form LPC 62 8/81

IL532-0610

FOR SHIPMENT OF HAZARDOUS
AND SPECIAL WASTE

44597

PLEASE TYPE

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-89)

Form Approved. OMB No. 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD389000896		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address ARGONNE NATIONAL LABORATORY 9700 S. CASS ARGONNE IL 60439				Location If Different		A. Illinois Manifest Document Number IL 6412614 FEE PAID IF APPLICABLE			
4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS 708-252-9551				6. US EPA ID Number		B. Illinois Generator's ID 0428020002			
5. Transporter 1 Company Name ILLINOIS RECOVERY SYSTEMS				8. US EPA ID Number		C. Illinois Transporter's ID 1105			
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone 708-297-0255			
9. Designated Facility Name and Site Address ENVIROPUR 7601 W. 47TH STREET MCCOOK IL 60525				10. US EPA ID Number ILD000646786		E. Illinois Transporter's ID 1105			
						F. Transporter's Phone 708-442-6000			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
a. NON-HAZARDOUS OIL/WATER				001. TT		014901			
b.								X X EPA HW Number 000424 Authorization Number	
c.								X X EPA HW Number Authorization Number	
d.								X X EPA HW Number Authorization Number	
J. Additional Description for Materials Listed Above				K. Handling Codes for Wastes Listed Above In Item #14 G = Gallons Y = Cubic Yards					
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name William E. Beavers				Signature <i>William E. Beavers</i>				Date Month Day Year 082994	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Thomas Klein				Signature <i>Thomas Klein</i>				Date Month Day Year 082994	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name William E. Beave				Signature				Date Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.								Date	
Printed/Typed Name R.C.M.				Signature <i>R. Gentry</i>				Date Month Day Year	

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 2. TSD MAIL TO IEPA
(RCRA AND PCB WASTES)

In case of a spill call the Illinois Office of Emergency Response at 217 / 782-7860 and the National Response Center at 800 / 424-8802 or 202 / 426-2675.

ATTACHMENT B.



44667

PLEASE TYPE

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-89)

Form Approved. OMB No. 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD984768432	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.
3. Generator's Name and Mailing Address ILLINOIS RECOVERY SYSTEMS INC P.O. BOX 203 WHEELING IL 60090			Location If Different 708-297-0255		A. Illinois Manifest Document Number IL6219576 FEE PAID IF APPLICABLE
4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS			6. US EPA ID Number		B. Illinois Generator's ID 0312535005
5. Transporter 1 Company Name STANTON INDUSTRIES			8. US EPA ID Number		C. Illinois Transporter's ID 3134 D. 708-782-8284 Transporter's Phone
7. Transporter 2 Company Name			10. US EPA ID Number		E. Illinois Transporter's ID F. () Transporter's Phone
9. Designated Facility Name and Site Address ENVIROPUR 7601 W. 47TH STREET MCCOOK ILLINOIS 60525			10. US EPA ID Number ILD000646786		G. Illinois Facility's ID 0311740002 H. Facility's Phone 708-442-6000
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. NON-HAZARDOUS OIL/WATER			001 TT	07200	1
b.					
c.					
d.					
J. Additional Description for Materials Listed Above			K. Handling Codes for Wastes Listed Above in Item #14 G = Gallons Y = Cubic Yards		
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Thomas Klein			Signature Thomas Klein		Date 09/01/94
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature Bill Lee		Date 09/01/94
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Date
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.			Signature Rick Gentry		Date 09/01/94

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 2. TSD MAIL TO IEPA
(RCRA AND PCB WASTES)

In case of a spill call the Illinois Office of Emergency Response at 217 / 782-7860 and the National Response Center at 800 / 424-8802 or 202 / 426-2675.

ATTACHMENT C.



ENVIROPUR
WASTE REFINING AND TECHNOLOGY, INC.

/601 West 47th Street
McCook, Illinois 60525
(708) 442-6000 • Fax (708) 442-6027

VIA FACSIMILE AND U.S. MAIL

September 12, 1994

Mr. Thomas Klein
Illinois Recovery Systems
P.O. Box 203
Wheeling, Illinois 60090

Re: Polychlorinated Biphenyl Contamination
Illinois EPA Manifest No. 6412614 (August 29, 1994) and
No. 6219576 (September 1, 1994).

Dear Mr. Klein:

The purpose of this letter is to memorialize the contents of the telephone conversations which you and I had this morning.

I informed you that on August 29, 1994, Illinois Recovery Systems (IRS) accepted from Argonne National Laboratory (Argonne) approximately 1,490 gallons of wastes described as "non-hazardous oil/water." (See Attachment A). IRS transported these wastes in a tanker truck to EnviroPur. On September 1, 1994, IRS generated approximately 7,200 gallons of wastes also described as "non-hazardous oil/water" and which Stanton Industries hauled to EnviroPur. (See Attachment B).

Once at our facility, these wastes were off-loaded into our 21,500 gallon holding tank where they were intermixed with other waste liquids. These wastes were then processed in our distillation unit and transferred to various holding tanks throughout the facility.

EnviroPur sent samples of the Argonne wastes and the IRS wastes, all of which were obtained during our sampling protocol and prior to intermixing, to an independent laboratory for analysis. The laboratory reported that Argonne's wastes contained polychlorinated biphenyls (PCBs), as defined at 40 CFR 761.3, in concentrations of 481.195 parts per million (ppm) and that the wastes which IRS shipped on September 1, 1994 contained PCBs in concentrations of 178.4 ppm.

Mr. Thomas Klein
Illinois Recovery Systems, Inc.
September 12, 1994
Page 2

Argonne's and IRS's wastes are now part of an indeterminate volume of liquid waste stored, among other places, at the Enviropur facility. The entire volume of waste is now regulated by the United States Environmental Protection Agency as a PCB containing waste pursuant to the Toxic Substances Control Act (40 CFR 761.1(b)).¹

Enviropur does not have a permit to store, treat or dispose of PCBs. Consequently, the PCBs must be promptly removed to, and managed by, an approved facility. Furthermore, Enviropur must decontaminate all surfaces which are contaminated with PCBs. As you are aware, these tasks are arduous and expensive. We believe that performance of these tasks is IRS's responsibility.

Enviropur requests that IRS notify the undersigned by 10:00 a.m., Wednesday, September 14, 1994, whether it will accept responsibility to perform or assure the performance of the following tasks:

1. The removal of the entire volume of PCB contaminated wastes to an approved PCB disposal facility;
2. decontamination of those surfaces contaminated with PCBs;
3. removal of any wastes generated during the decontamination process to an approved PCB disposal facility; and,
4. the disposal of all such PCB wastes in a lawful manner.

IRS has been a good, long-term customer of Enviropur and we have ever confidence that IRS will step forward and assume this responsibility. IRS, however, must act quickly both to satisfy its statutory and regulatory obligations, and to restore Enviropur's facility to operation.

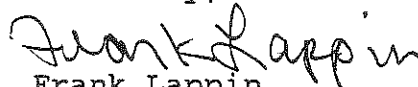
¹ Please see Attachment C for a list of those sections of the TSCA statute and the regulations promulgated by U.S. EPA pursuant to TSCA, which IRS appears to have violated by delivering PCB wastes to Enviropur.

Mr. Thomas Klein
Illinois Recovery Systems, Inc.
September 12, 1994
Page 3

Finally, Enviropur is required to submit to U.S. EPA a written report concerning our receipt of unmanifested PCB waste from IRS and Argonne. (See 40 CFR 761.210(c)). Both IRS and Enviropur will be better off if Enviropur can demonstrate that IRS has removed the PCBs from our facility before that date.

Thank you, in advance, for your early consideration and response.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank Lappin", is written over the typed name.

Frank Lappin
Vice-President of Operations

FL:spk
Enclosures

ATTACHMENT D.



ENVIROPUR
WASTE REFINING AND TECHNOLOGY, INC.

7601 West 47th Street
McCook, Illinois 60525
(708) 442-6000 • Fax (708) 442-6027

VIA FACSIMILE AND U.S. MAIL

September 12, 1994

Mr. Michael Sodaro
Department Manager
Waste Management Department
Argonne National Laboratory
Mail Code EWM/340
9700 South Case Avenue
Argonne, Illinois 60439

Re: Polychlorinated Biphenyl Contamination
Illinois EPA Manifest No. 6412614 (August 29, 1994)

Dear Mr. Sodaro:

The purpose of this letter is to memorialize the contents of the telephone conversations which I had this morning with Argonne National Laboratory ("Argonne") representative, Chris Grandy.

I informed Mr. Grandy that on August 29, 1994, Argonne shipped approximately 1,490 gallons of wastes described as "non-hazardous oil/water" to Enviropur. (See Attachment A). These wastes were transported in a tanker truck by Argonne's agent/contractor, Illinois Recovery Systems. Once at the Enviropur facility, the wastes were off-loaded into our 21,500 gallon holding tank where they were intermixed with other waste liquids. These wastes were then processed in our distillation unit and transferred to various holding tanks throughout our facility.

Enviropur sent samples of the Argonne wastes, obtained during its sampling protocol and prior to intermixing, to an independent laboratory for analysis. The laboratory reported that Argonne's wastes contained polychlorinated biphenyls (PCBs), as defined at 40 CFR 761.3, in concentrations of 481.195 parts per million (ppm). Argonne's wastes are now part of an indeterminate volume of liquid waste stored, among other places, at the Enviropur facility. The entire volume of waste is now regulated by the United States Environmental Protection Agency as a PCB containing waste pursuant to the Toxic Substances Control Act (40 CFR 761.1(b)).

Enviropur does not have a permit to store, treat or dispose of PCBs. Consequently, the PCBs must be promptly removed to, and managed at, an approved facility. Furthermore, Enviropur must decontaminate all surfaces which are contaminated with PCBs. As you are aware, these tasks are arduous and expensive. We believe that performance of these tasks is Argonne's responsibility.

Mr. Michael Sodaro
Department Manager
Waste Management Department
Argonne National Laboratory
September 12, 1994
Page 2

Enviropur requests that Argonne notify the undersigned by 10:00 a.m., Wednesday, September 14, 1994, whether it will accept responsibility to perform or assure the performance of the following tasks:

1. The removal of the entire volume of PCB contaminated wastes to an approved PCB disposal facility;
2. decontamination of those surfaces contaminated with PCBs;
3. removal of any wastes generated during the decontamination process to an approved PCB disposal facility; and,
4. the disposal of all such PCB wastes in a lawful manner.

Argonne enjoys a reputation as an environmentally responsible institution. We have ever confidence that Argonne will step forward and assume this responsibility. Argonne, however, must act quickly both to satisfy its statutory and regulatory obligations, and to restore Enviropur's facility to operation.

Finally, Enviropur is required to submit to U.S. EPA a written report concerning our receipt of Argonne's unmanifested PCB waste. (See 40 CFR 761.211(c)).¹ Both Argonne and Enviropur will be better off if Enviropur can demonstrate that Argonne has removed the PCBs from our facility before that date.

Thank you, in advance, for your early consideration and response.

Sincerely,

Frank Lappin

Frank Lappin
Vice-President of Operations

FL:spk
Enclosures
cc. Mr. Chris Grandy
Mr. William Beavers
Illinois Recovery Systems

¹ Please see Attachment B for a list of those sections of the TSCA statute and the regulations promulgated by U.S. EPA pursuant to TSCA, which Argonne appears to have violated by delivering PCB wastes to Enviropur.

ATTACHMENT A.



PLEASE TYPE

(Form designed for use

(12-pitch) typewriter.)

State Form LPC 82 8/81

IL537 4-10

EPA Form 3700-22 (R 9)

Form Approved, OMB No. 2050-0039, Expires 9-30-94

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

ILD389000896

Manifest
Document No.

2. Page 1

of 1

Information in the shaded areas is not
required by Federal law, but is required by
Illinois law.

3. Generator's Name and Mailing Address

Location If Different

ARGONNE NATIONAL LABORATORY
9700 S. CASS ARGONNE IL 60439

4. 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS 708-252-9551

5. Transporter 1 Company Name

6.

US EPA ID Number

ILLINOIS RECOVERY SYSTEMS

7. Transporter 2 Company Name

8.

US EPA ID Number

9. Designated Facility Name and Site Address

10.

US EPA ID Number

ENVIROPUR
7601 W. 47TH STREET
MCCOOK IL 60525 | ILD000646736

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13.
Total
Quantity14.
Unit
Wt/Vol

a.

NON-HAZARDOUS OIL/WATER

001

PT

01.4901

b.

c.

d.

15. Special Handling Instructions and Additional Information

16. Handling Codes for Wastes Listed Above

G = Gallons Y = Cubic Yards

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date

Month Day Year

William E. Beavers

William E. Beavers

082994

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

Thomas Klein

Thomas Klein

082994

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

William E. Beavers

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Date

Month Day Year

B.C. G.

B. Gentry

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1980, Chapter 115, 102, Sections 1004 and 1027, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator, not to exceed \$25,000 per day of violation. Felicitations of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Federal Management Center.

ATTACHMENT B.



PLEASE TYPE

(Form designed for use on

(12-pitch) typewriter.)

State Form LPC 82 8/81

IL53

EPA Form 6700-22 (Rev. 9)

Form Approved, OMB No. 2050-0039, Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD984768432	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.
3. Generator's Name and Mailing Address ILLINOIS RECOVERY SYSTEMS INC P.O. BOX 203 WHEELING IL 60090		Location If Different 708-297-0255		Illinois Hazardous Waste Document Number 1162195 Illinois Generator's ID 312535005 Illinois Transporter's ID 608-182-8484 Illinois Transporter's Phone 708-142-6000	
4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS		5. US EPA ID Number		Illinois Facility's ID 0311740002 Illinois Facility's Phone 708-142-6000	
6. Transporter 1 Company Name STANTON INDUSTRIES		7. US EPA ID Number		Illinois Transporter's ID 608-182-8484 Illinois Transporter's Phone 708-142-6000	
8. Transporter 2 Company Name		9. US EPA ID Number		Illinois Facility's ID 0311740002 Illinois Facility's Phone 708-142-6000	
9. Designated Facility Name and Site Address ENVIROPUR 7601 W. 47TH STREET MCCOOK ILLINOIS 60525		10. US EPA ID Number ILD000646786		Illinois Facility's ID 0311740002 Illinois Facility's Phone 708-142-6000	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity	14. Unit WUVol
a. NON-HAZARDOUS OIL/WATER		001 TT		07200	1
b.					
c.					
d.					
15. Additional Description for Materials Listed Above		K. Handling Codes for Wastes Listed Above In Item #14 G=Gallons Y=Cubic Yards			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Thomas Klein		Signature Thomas Klein		Date 09.01.94	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Bill Lee		Signature Bill Lee	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name Rick Gentry		Signature Rick Gentry		Date 09.01.94	

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 2: TSD MAIL TO IEPA
(RCRA AND PCB WASTES)

A T T A C H M E N T C.

Argonne's deliver of PCB wastes to Enviropur appears to have violated the following:

- I. Toxic Substances Control Act (15 U.S.C. 2601, et seq.).
 - A. Section 6(e)(2) of TSCA, 15 U.S.C. 2605(e)(2).
 - B. Section 15 of TSCA, 15 U.S.C. 2614.

- II. Code of Federal Regulations, Title 40, Part 761.
 - A. 761.40(e).
 - B. 761.40(h).
 - C. 761.45(a).
 - D. 761.60(a).
 - E. 761.79.
 - F. 761.180(a).
 - G. 761.202(a).
 - H. 761.205(a)(2).
 - I. 761.207.
 - J. 761.208.
 - K. 761.209.

RECEIVED
JUL 12 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

FO5
RECEIVED

JUL 3 1989

IEPA/DLPC

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Motor Oils Refining Co.

U.S. EPA I.D. No.: ILD 000646 786 0311740002

Street: 7601 W. 47th St.

City: McCook State: IL Zip Code: 60525

Telephone: 312/442-6000

Operator: Motor Oils Refining Co.

Street: 7601 W. 47th St.

City: McCook State: IL Zip Code: 60525

Telephone: 312/442-6000

Owner: Unknown

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 6/16/89 Time: 9:00am - 10:45am Weather Conditions: _____

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>John Maher</u>	<u>IEPA</u>	<u>312/345-9780</u>

Facility Representatives:	<u>Frank Happin</u>	<u>312/442-6000</u>
	<u>Low Filosa</u>	<u>312/442-6000</u>
	<u>Stuart Rubin</u>	<u>312/442-6000</u>

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	_____	_____	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	<u>✓</u>	_____	_____	<u>✓</u>
Disposer	_____	_____	_____	_____

0311740002
Motor Oils Refining Co.
6/16/89

INSPECTION SUMMARY

Motor Oils Refining Co. in McCook accepts used lubricating oils from off-site and re-refines them. Their primary customers are from the railroad industry. Oil from these customers is shipped by rail. However, they also receive waste oil by tanker truck. The site claims to be a non-handler of hazardous waste, but Illinois EPA has documentation that refutes their claim. Based on documents obtained during an inspection of BTL Specialty Resins, Motor Oils Refining Co. has accepted listed hazardous waste (K022). This site does not have interim status or a RCRA permit to receive K022 waste from off-site.

The site wanted to make an audio tape recording of the conversations during the inspection. IEPA agreed to the recording. Once the tape recording began, the site representative eventually stated that he would not answer my questions based on his position that his site was not subject to RCRA. Therefore, the land ban checklist could not be completed, and the presence or absence of apparent violations could not be determined.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]? *Unknown - See narrative.*

o F-solvent ☐ Yes ☐ No ☐ NA
 o California List ☐ Yes ☐ No ☐ NA
 o First Third ☐ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☐ No

a. What date was the waste analysis plan last revised? _____

b. Are analyses conducted on-site or off-site?

☐ On-site ☐ Off-site

Identify off-site lab: _____

c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☐ No ☐ NA

d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method. *Unknown - See Narrative*

____ Tanks
____ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

____ Yes ____ No

5. Do operating records agree with container labeling?

____ Yes ____ No ____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

____ Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____ Yes _____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

_____ Yes _____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

_____ Yes _____ No _____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

_____ Yes ☒ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes X _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes ☒ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

MORECO Energy, Inc.

7601 W. 47TH STREET, McCOOK, ILLINOIS PHONE 312/242-2252

1LD 000 646 786

December 18, 1987

William E. Muno, Chief
RCRA Enforcement Section
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, IL. 60604

RECEIVED
DEC 23 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Dear Mr. Muno:

This letter is in response to your letter of Dec. 10, 1987. When I first responded to you on Sept. 5, of this year, I may have been premature in my pronouncement of our generated fuel as being spec fuel.

It is the light end cut from our distillation processes. It is also burned strictly on-site. However, our laboratory has now accumulated significant amounts of data which show the fuel to be between 0 and 4000 ppm total halogens. There are no metals, but this appears to be a concentrating phenomena from the used oils brought in on a daily basis.

Therefore, based on a mean over the past two months of 2563 ppm total halogens, it appears we are burning an off-spec fuel. It should be noted that the highest quantity measured over the two month span was 3893 ppm total halogens. Not once was 4000 ppm exceeded.

If you or your staff require any additional information, please feel free to contact me at (312) 229-0673, ext. 302.

Sincerely,



Tom Corriveau
Director of Technical &
Environmental Affairs

TC/jc

DEC 10 1987

Thomas Corriveau, Director
Technical and Environmental Affairs
MORECO Energy, Inc.
7601 West 47th Street
McCook, Illinois 60525

Re: Notice of Violation
ILD 000 645 786

Dear Mr. Corriveau:

This letter is to notify you that the United States Environmental Protection Agency (U.S. EPA) has received your response, requested in a Notice of Violation (NOV) issued August 5, 1987, on September 25, 1987. Your response, having been reviewed by U.S. EPA, has been determined inadequate.

It has been determined that at this time your facility may be an incidental burner (see the enclosed memo). If your facility does qualify as an incidental burner, item number one of the NOV issued August 5, 1987, would not apply. Therefore, the collectors supplying used oil would not be marketers subject to the marketer requirements of 40 CFR Part 266 and your facility would not be required to provide the collector with a one-time written and signed notice as specified in 40 CFR 266.44(c).

Item two of the NOV issued August 5, 1987, however, does still apply and analyses or other documentation on the fuel cut burned is necessary to adequately claim used oil fuel is on-specification. The presumption of mixing, 40 CFR 266.40(c), as indicated in the enclosed memo, applies at the point where used oil feedstock is entering the process. Your response did not address the several analyses which showed greater than 1000 ppm of total halogens and are presumed hazardous.

It is required that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions taken to comply with the above requirements. Failure to reply within the specified time may result in additional Federal Enforcement actions.

If you have questions and/or comments regarding this matter, please contact Ms. Shirlee Brauer (312) 886-4591 or Ms. Laura Lodisio (312) 886-9070 of my staff.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Section

Enclosure

cc: Gary King, IEPA/w enclosure
Richard Findley, IEPA/w enclosure

bcc: Laura Lodisio

5HE:SBRAUER:voliver:12/1/87

	TPYST	OTHER	OTHER	UNIT	SECT.	SECT.	UNVER
	SECT	SECT	SECT	SECT	SECT	SECT	SECT
SB		12-4-87		12-7-87	12/1/87	SK Ston	12/8/87



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 17 1987

RECEIVED
NOV 20 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR
OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

Subject: Clarification of used oil fuel regulations

From: David Tomten ^{DT}
Waste Treatment Branch

To: Shirley Brauer
US EPA, Region 5

This memorandum is in response to the questions you had in our recent conversations regarding application of the used oil burning regulations. You wanted clarification of the status of a re-refiner who burns used oil (specifically, the "light end" fraction) incidental to processing, and the status of the collectors who supply used oil to that re-refiner. I hope the following paragraphs clarify the answers to these questions to your satisfaction.

A collector who sells used oil to a person burning incidentally to processing in order to produce a used oil fuel is not considered to be a marketer of used oil fuel (see 40 CFR §266.43(a)(1)). We feel that marketing to a person processing to produce a re-useable lube oil should be treated similarly. If the collector sells used oil to other customers who are burners, however, the collector would be considered to be a marketer, and as such, subject to the administrative standards of §266.43.

A re-refiner burning "light ends" from the distillation of used oil on-site to produce a lube oil basestock is regulated as a burner of used oil fuel (assuming used oil received by the refiner is not a hazardous waste). The light ends, which often contain total halogens in excess of 1000 ppm, are regulated as used oil rather than as hazardous waste provided that the used oil feedstock entering the process contains less than 1000 ppm of total halogens (or the presumption of mixing can be successfully rebutted). Light ends containing in excess of 4000 ppm of total halogens, when burned for energy recovery, are regulated as off-specification used oil fuels, and as such, cannot be burned in nonindustrial boilers.

If I can be of any additional assistance, please don't hesitate to call. I can be reached at (202) 382-3298.

cc: Hope Pillsbury
Bob April
Meg Silver

MORECO Energy, Inc.

7601 W. 47TH STREET, McCOOK, ILLINOIS PHONE 312/242-2252

Sept. 5, 1987

Mr. William Munro, Chief
RCRA Enforcement Section
U.S. EPA Region V
230 S Dearborn St.
Chicago, IL. 60604

RECEIVED
SEP 25 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Dear Mr. Munro:

This letter is in response to the inspection of our McCook refinery. There are some points of contention which must be addressed.

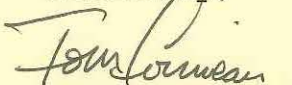
Our facility does not accept any shipments labeled as off-specification used oil fuel. All material coming into our facility is generically permitted, used lubricating oil for actual re-refining.

All incoming waste oil goes through atmospheric and vacuum distillation processes. These processes generate a fuel cut which is very similar to #2 Fuel. We do burn this fuel on-site but maintain that it is spec fuel. This contention is due to the fact that no metals carry over and the flash point is around 135°F.

Regarding our notification as a marketer/burner of hazardous waste fuel, this happened prior to my start date. I am reviewing this and may consider a re-submission.

Feel free to call me at your convenience if you have any questions.

Sincerely,


Tom Corriveau

Corporate Environmental Director

TC/jc

AUG 05 1987

5HE-12

Thomas Corriveau, Director
Technical & Environmental Affairs
MORECO Energy, Inc.
7601 West 47th Street
McCook, Illinois 60525

Re: Notice of Violation
ILD 000 646 786

Dear Mr. Corriveau:

On July 1, 1987, your facility located at 7601 West 47th Street, McCook, Illinois was inspected by United States Environmental Protection Agency (U.S. EPA) representatives, Ms. Shirlee Brauer and Ms. Laura Lodisio. The purpose of the inspection was to evaluate compliance of all waste-as-fuel activities conducted by MORECO Energy, Inc., with the requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations codified at 40 CFR Part 266, Subparts D and E.

Based on information provided by facility personnel, record review and visual inspections of the site at the time of investigation, it was determined that the facility accepts used oil to be burned for energy recovery. It was also determined that the facility is in violation of the following requirements:

1. 40 CFR 266.44(c) which requires a burner prior to accepting any shipments of off-specification used oil fuel from a marketer, to provide the marketer with a one-time written and signed notice certifying that:
 - i. He has notified EPA of his used oil management activities;
and
 - ii. They will burn the used oil only in an industrial boiler or furnace identified in 40 CFR 266.41(b).
2. 40 CFR 266.44(d)(2) requires burners who treat off-specification used oil to meet the specification provided under 40 CFR 266.40(e) must obtain and retain for three years analysis (or other information) documenting that the used oil meets the specification. At the time of inspection, several analyses showed total halogens to be greater than 1000 ppm. 40 CFR 266.40(c) specifies that used oil containing more than 1000 ppm of

total halogens is presumed to have been mixed with halogenated hazardous waste listed in 40 CFR Part 261, and is, therefore considered hazardous waste.

In addition, on January 29, 1986, the facility notified the U.S. EPA that it is a marketer and burner of hazardous waste fuel, a marketer and burner of off-specification used oil fuel and a burner of on-specification used oil fuel, first claiming the oil meets the specification. After the above mentioned inspection, it appears this information may not be correct. Should you find in re-evaluating your activities that the notification filed inaccurately reflects your current activities, you may wish to refile a new Notification of Hazardous Waste Activity.

It is required that you submit a response in writing to this office no later than 30 days after receipt of this letter documentating the actions taken to comply with the above requirements. Failure to reply within the specified time may result in additional Federal enforcement actions.

If you have questions and/or concerns regarding this matter, please contact Ms. Shirlee Brauer (312) 886-4591 or Ms. Laura Lodisio (312) 886-7090 of my staff.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Section

Enclosure

cc: Gary King
IEPA, Springfield

Richard Finley
IEPA, Maywood

bcc: L. Lodisio
J. Boyle
SBRAUER:slowery:7-30-87

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWB CHIEF	WMD DIR
INT. DATE	7-30-87	SB 7/31/87		RCR 7-31-87	ap 8/3/87	WEM 8/5/87		

RCRA Checklist for Inspection of Hazardous Waste Fuel Marketers/Processors:

Name of Facility: Motor Oils Refining Co.; (Moreco Energy Inc.)

Address: 7601 W. 47th St.

McCook, IL 60525

EPA Waste Fuel I.D. Number: ILD 000 646 786

Facility Inspection Representative: Lou Filosa & Tom Correveau

Title: V.P. of Manufacturing

Telephone: (312) 229-0673 or (312) 442-6166

*Specify NA if questions do not apply.

Site Characterization:	yes	no	comments:
1. Does the facility accept hazardous waste?	<u> </u>	<u> </u>	<u>take used oil with</u> <u>>1000 ppm TOX</u>
2. Does the facility blend hazardous waste with used oil to be marketed as fuel?	<u> </u>	<u> x </u>	<u>but no listed waste.</u>
3. Does the facility accept hazardous waste fuel, i.e., used oil previously blended with hazardous waste?	<u> </u>	<u> x </u>	<u> </u>
4. Does the facility only accept characteristic hazardous waste?	<u> </u>	<u> x </u>	<u> </u>

Used oil burned for energy recovery that is hazardous solely because it exhibits a characteristic of hazardous waste is subject to regulations under Subpart E rather than Subpart D. Refer to the Used Oil Fuel Marketer Checklist. (§266.300(b)(1))

5. Does the facility only accept non-hazardous used oil? If so, refer to the Used Oil Fuel Marketer Checklist.	<u> x </u>	<u> </u>	<u> </u>
6. Does the facility generate hazardous waste? If so, refer to generator checklist.	<u> </u>	<u> x </u>	<u> </u>
7. Does the facility accept only used oil?	<u> x </u>	<u> </u>	<u> </u>
8. Specify other material recycled as fuel.			
<u> NONE </u>			

9. Check the following general operating practices:

Storage	Treatment	Disposal
<input type="checkbox"/> Drum	<input type="checkbox"/> Settling	<input type="checkbox"/> Landfill
<input checked="" type="checkbox"/> Above-ground tank(s)	<input checked="" type="checkbox"/> Heat addition	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Underground tank(s)	<input type="checkbox"/> In-Line Filtering	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Other	<input type="checkbox"/> Cerifugation	
<input type="checkbox"/> Tank sizes	<input type="checkbox"/> Screen Filtration	<input type="checkbox"/> Other
	<input checked="" type="checkbox"/> Dehydration	
	<input type="checkbox"/> Emulsion Breaking	
	<input type="checkbox"/> Blending	

X Re-refining

Descriptions and Observations: 1500 gal. of on-spec. UOF per day burned

10. Has the facility notified the U.S. EPA of their waste as fuel activities by January 29, 1986? (§266.34(b))
- | | | |
|----------|--------------------------|-----------|
| yes | no | comments: |
| <u>x</u> | <input type="checkbox"/> | <u></u> |

Specify Notification Information:

T, TSD, HWF-OM&B, off-spec. - OM&B, on-spec. OM

11. Has the facility submitted a Part A for storage of hazardous waste by May 29, 1986? (§266.34(c))
- | | | |
|----------|--------------------------|-----------------|
| <u>x</u> | <input type="checkbox"/> | <u>11-29-86</u> |
|----------|--------------------------|-----------------|

Specify Part A information: 2.5 mill 502, 50,000 yd³

S01

12. Does the facility accept hazardous waste? Specify waste and generator type. (Request manifests for review)
- | | | |
|--------------------------|----------|---------|
| <input type="checkbox"/> | <u>x</u> | <u></u> |
|--------------------------|----------|---------|

☐ Small Quantity Generators

(☐ <100kg/m or ☐ 100 ≤1000 kg/m)

☐ Large Quantity Generators

X generate - off-gas ~~is~~ incinerated, -WW -> POTW, -filtercake → sw ldf

Specify waste types: _____

- | | yes | no | comments: |
|--|-------|-------|------------------|
| 13. Does the facility have manifests for all shipments of hazardous waste and blended hazardous waste fuel received and sent? (§265.70) | _____ | _____ | NA |
| 14. Does the facility comply with the prohibitions of §266.31(a)? Review operating records, certifications from burners and invoices. If available obtain a customer list from the facility. | _____ | _____ | NA - do not sell |
| 15. Does the facility have a copy of the <u>required</u> notice from burners or marketers to whom waste fuel is marketed? (§266.34(e)) | _____ | _____ | NA - do not sell |
| 16. Does the facility have invoice information or an operating record for shipments of used oil claimed to be specification used oil fuel? (§266.43(b)(6)) | _____ | _____ | NA - do not sell |
| 17. Does the facility analyze for metals, halogens and flash point? (§266.43(b)(1)) | X | _____ | _____ |

Specify methods: A Emmission (DCP), x-ray defraction flourscence,
closed up

18. Does the facility have the records required under §266.34(f) i.e. copies of certifications from burners and other marketers _____ NA - do not sell

Note: If a facility markets hazardous waste fuel, the facility is subject to storage requirements of Parts 262, 264 or 265 and 270, Subparts A through L. Therefore, the RCRA checklist for inspection of TSD Facilities may be useful.

Inspectors's Name: Laura Lodisio/Shirlee Brauer

Title: Env. Sceintist/Env. Engineer

Agency: U.S. EPA (5HE-12)

Office Location: 230 S. Dearborn, Chgo., IL 60604

Date of Inspection: 07/1/87

Comments:

(312) 229-0673

Office (312) 229-0673
Plant (312) 442-6166

THOMAS L. CORRIVEAU

DIRECTOR OF
TECHNICAL & ENVIRONMENTAL AFFAIRS

MORECO Energy, Inc.

Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

LOUIS FILOSA

VICE PRESIDENT OF MANUFACTURING

MORECO Energy, Inc.

7601 West 47th Street
McCook, Illinois 60525

Motor Oils Refining Co.
Excel Marketing, Inc.

RCRA Checklist for Burners of Used Oil Fuel
and Hazardous Waste Fuel

Name of Facility: MORECO ENERGY INC.

Address: _____

EPA Waste Fuel I.D. Number: 12D 000 646 786

Facility Inspection Representative: _____

Title: _____

Telephone: _____

*Specify NA if questions do not apply.

The following questions pertain to facilities regulated under Part 266 who are burning waste fuel for energy recovery. These do not necessarily apply to incineration under Subpart O of part 265.

1. Does the facility burn used oil fuel? ☒ yes ☐ no
Specify: off-specification x specification
2. Does the facility burn hazardous waste fuel? ☐ yes ☒ no
3. Does the facility's burning unit(s) classify as industrial boiler(s) or industrial furnace(s)? ☒ yes ☐ no
Burning unit type: ind boiler
4. Has the owner/operator notified EPA of their waste fuel activity? (§266.35(b) or §266.44(b)) ☒ yes ☐ no
Specify Notification Information: _____
5. Was the facility existing before May 29, 1986? ☒ yes ☐ no
6. Does the facility have records of the required notices sent to the fuel suppliers (marketers) for hazardous waste fuel or off-specification used oil? (§266.35(d) or §266.44(c)) ☐ yes ☒ ~~no~~ NA
7. Does the facility have Interim Status or a permit (§3005) for storage of hazardous waste? ☒ yes ☐ no

Note: Storage requirements under Subparts A through L, Parts 262, 264 or 265 and 270 apply to these facilities as of May 29, 1986. Therefore, refer to the RCRA Checklist for Inspection of TSD Facilities.

8. Does the facility burn self-generated used oil fuel in a space heater on-site?

yes

no

9. Is the space heater less than 0.5 million BTU/hr and vented to the ambient air?

yes

no NA

Comments: kept manifests

Claim on-spec w/analyses on 1-15-86 and knowledge of process (re-refining yeilding
consistant fuel product). Fuel is top cuts from re-refining stages. Fuel fed directly
into industrial boiler.

Typical vaule for TOX between 500 ppm & 11,000 high, next high 5,000

Inspectors' Name: Shirlee Brauer/Laura Lodisio

Title: Env. Engineer/Env. Scientist

Agency: U.S. EPA (5HE-12)

Office Location: 230 S. Dearborn, Chgo., IL 60604

Date of Inspection: 7/1/87

*Amber oil analyses only showed one sample w/TOX data indicating 332 ppm.

Age Group	1990	2000	2010	2020
0-14	15%	12%	10%	8%
15-24	12%	10%	8%	6%
25-34	10%	8%	6%	4%
35-44	8%	6%	4%	2%
45-54	6%	4%	2%	1%
55-64	4%	2%	1%	0%
65-74	2%	1%	0%	0%
75+	1%	0%	0%	0%

ILD 000 646 786

bioRxiv preprint doi: <https://doi.org/10.1101/2019.05.20.256400>; this version posted May 20, 2019. The copyright holder for this preprint (which was not certified by peer review) is the author/funder, who has granted bioRxiv a license to display the preprint in perpetuity. It is made available under aCC-BY-NC-ND 4.0 International license.

Applicability

Regulations of 40 CFR Part 266, Subpart E apply to used oil burned for energy recovery in boilers or industrial furnaces. Used oil includes any fuel produced from used oil by processing, blending, or other treatment. (§266.40(a))

yes no comments:

- NA - do not sell
UOF

- _____

- _____

- ↓

Disposal

Landfill

<input type="checkbox"/> Other	<input type="checkbox"/> Cerifugation	
<input type="checkbox"/> Tank sized	<input type="checkbox"/> Screen Filtration	<input type="checkbox"/> Other
<input type="checkbox"/>	<input type="checkbox"/> Dehydration	:
<input type="checkbox"/>	<input type="checkbox"/> Emulsion Breaking	
	<input type="checkbox"/> Blending	

Descriptions and
Observations:

	yes	no	comments:
7. Has the facility notified the U.S. EPA of their waste as fuel activities by January 29, 1986? (§266.43(b)(3))	<input type="checkbox"/>	<input type="checkbox"/>	NA
Specify Notification Information:			
8. Has the facility submitted a Part A for storage of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	
Specify Part A information:			
9. Does the facility generate hazardous waste? If so, refer to generator checklist.	<input type="checkbox"/>	<input type="checkbox"/>	
10. Does the facility market only to burners or other marketers who have notified U.S. EPA? (§266.43(b)(2))	<input type="checkbox"/>	<input type="checkbox"/>	
11. Does the facility have manifests for all shipments of hazardous waste received and sent? (§265.70)	<input type="checkbox"/>	<input type="checkbox"/>	
12. Do invoices contain the following information (§266.43(b)(5));			
(i) An invoice number;	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) Marketer's EPA ID number and Receiver's EPA ID Number;	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) Names and addresses of shipping and receiving facilities;	<input type="checkbox"/>	<input type="checkbox"/>	
(iv) Quantity of off-specification fuel being delivered;	<input type="checkbox"/>	<input type="checkbox"/>	✓

	yes	no	comments:
(v) Date of shipment or delivery; and			NA
(vi) Statement - "This used oil is subject to EPA regulation under 40 CFR Part 266"			
13. Does the facility have copies of invoices received and sent for the past three years? (§266.43(b)(6))			
14. Does the facility have copies of required notices from burners and other marketers, received and sent? (§266.43(b)(5))			
15. Does the facility first claim the used oil meet the specifications?			
16. Does the facility have records of analyses or other information used to claim the used oil meets the specifications? (§266.43(b)(1))			
17. Does the facility have a record or operating log specifying for <u>each</u> shipment ; (§266.43(b)(6)(i))			
A. Name and address of receiving facility;			
B. Quantity of used oil fuel delivered;			
C. Date of delivery or shipment;			
D. Cross-reference to records of used oil analyses or other information?			

Inspectors's Name: Shuler Brauer

Title: Env. Engr.

Agency: U.S. EPA

Office Location: Chicago, IL

Date of Inspection: 7/1/87

Comments:

Notes

Receives waste oils - each load is weighed, take sample, w/approval move to feed stock tanks, sample again, put oil in main tank. Distillation (atmos + vacuum) to re-refine.

80% Lube
10% Asphalt
10% Fuel

all materials from re-refining

Check for F.P. (150), pH (4-9), CC (50,000 ppm) X-ray diffraction flour

Burn on-spec in on-site burning unit.

Pierce/Moreco - send some oils not good enough for lube, but good for fuel. Do ^{analyses} sampling at McLook w/generators sample.
(Mike Bedoli)

Tom - Amber takes samples at generators prior to picking up used oil and another sample when tank full.

Pierce/MORECO - dehydrates, not allowed to re-refine.

MORECO Energy, Inc.

76 W. 47TH STREET, McCOOK, ILLINOIS PHONE 312/242-2252

Ms. Judy Greenberg
A.I.S. 5HS-JCK 13
U.S. EPA
Region V
230 S. Dearborn St.
Chicago, Illinois 60604

RECEIVED

January 27, 1986

JAN 28 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

ILD000646786 TRS, TSD, PA-9

ILD000810291 G, TSD, PA-9

ILD041538687 TRS, TSD, PA

ILD480794929 TRS, TSD, PA-9

MID000725069 NOT-7

WID980570246 G, TSD, PA-9

RE: 40 CFR Part 261, 264, 265,
266, 271 -
Federal Register 11/29/85

Dear Ms. Greenberg:

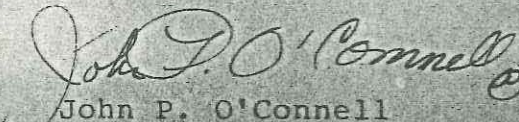
The EPA published regulations related to used oils in the 11/29/85 Federal Register.

The Association of Petroleum Re-refiners have alerted the EPA at a Dallas meeting that a major problem exists in interpreting these regulations, as it relates to the 1,000ppm Halogen Rebuttable Assumption. A copy of the draft letter given to Mr. John Lehman and Mr. Michael Petruska is attached. A final letter giving actual data is currently being sent to the EPA.

Our company handles used oils for a wide cross-section of industry and commerce. We face a dilemma, in that, if we assume most used oils will be classified as hazardous under the assumption as they probably exceed the 1,000 ppm chlorine level, we must notify the EPA per the above final regulations. Based on the above, our facilities located in McCook, Illinois, Springfield, Illinois, Rock Island, Illinois, Milwaukee, Wisconsin, Utica Michigan, and Oakwood, Illinois, would be storing and recycling hazardous wastes for which we would need in the future a RCRA Part A and Part B Permit. In addition, we would also become Marketers and Burners of Hazardous Waste Fuel and/or off specification fuels.

The key to the above is the interpretation of the recently published regulations. We have attached registration forms for our sites and company, but we are not sure if these are or will be required pending the EPA answering the questions raised in the attached letter.

Sincerely,


John P. O'Connell
President

JPO:amk

Enclosures



Motor Oils Refining Company

ILD 000 646 786

June 21, 1984

RECEIVED

JUN 25 1984

WASTE MANAGEMENT
BRANCH

Mr. David Dolan
Waste Management Branch
U. S. ENVIRONMENTAL PROTECTION AGENCY
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Dolan:

Enclosed is the correspondence we discussed in our last telephone conversation. To date we have not received a reply on my March 5, 1984 letter to you.

I would also like to have someone at the Federal EPA level review our general permits from the Illinois EPA where they have said we do not need a Federal I.D. to handle it. I want all agency's in agreement.

Sincerely,

MOTOR OILS REFINING COMPANY

Kenneth L. Fredette
Vice President of Finance

KLF:kf

Enclosure

MORECO Energy, Inc.

7601 W. 47TH STREET, McCOOK, ILLINOIS PHONE 312/242-2252

March 5, 1984

Mr. David Dolan
U.S. EPA
Region V
230 South Dearborn St.
Chicago, Illinois 60604

Dear Mr. Dolan:

Per your request, this is to notify you that MORECO Energy, Inc. has processed at it's Chicago re-refining plant, used petroleum products some of which could have been considered hazardous under Characteristic of Hazardous Wastes of Subpart C of CFR-40-261.20.

In addition, some of the used lubricants brought into our operation contained incidental amounts of listed hazardous wastes. It is our understanding in a conversation with the EPA officials in Washington that incidental contamination of used oil would not place the used oil collected into a listed hazardous classification, i.e. see attached Illinois EPA permit application which was granted to MORECO Energy, Inc. under State Permit #921158. In this case, Mobil Oil in their laboratory used certain lab chemicals and solvents incidentally in the course of their normal lubricant analysis procedures. This State permit is the only one we have where possible incidental contaminants are separately listed even though similar contamination probably exist in other feed streams.

Based on the above, MORECO Energy, Inc. has not brought into its operation any listed hazardous wastes.

Also, I would like to have you further clarify your letter dated February 27, 1984, to us. If you could give us a letter with the following statements in it, it would help us explain our current status to existing customers who assume that we need a RCRA Permit to recycle their used petroleum products.

- 1) MORECO Energy, Inc. is allowed to continue to take into its Chicago operation for recycling used petroleum products which might meet the characteristic of hazardous waste criteria but are not listed hazardous wastes.

WASTE MANAGEMENT
BRANCH

MAR 06 1984

RECEIVED

received
3-15-84

COPY 2

Page Two
March 5, 1984

- 2) When the regulations relative to the recycling of used petroleum products are issued by the EPA, MORECO Energy, Inc.'s facility will be able to qualify for interim status as an existing hazardous waste management facility by submitting Part A of the permit application in accordance with 40 CRF 2070.1(e).
- 3) MORECO Energy, Inc. will still have to continue to meet all applicable State and local EPA requirements.

I wish to apologize for any misunderstanding that might have occurred in the past. It is our intent to continue to work very closely with the Federal EPA in development of federal standards for recycling facilities and to provide you promptly with any information you need.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth L. Fredette", with a stylized, sweeping flourish at the end.

Kenneth L. Fredette
Vice President of Finance

KLF/dmg

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL
SPECIAL WASTE STREAM APPLICATION

REFERENCE # _____

CARD
TYPE

(FOR AGENCY USE 1 P S W C 5) WASTE STREAM NUMBER 921158 TRANS CODE 13 DATE ENTERED 15 1 1 20
(AUTHORIZATION)

This application is a: (check one) ☒ New Application ☐ Renewal _____ Waste Stream Number _____

This application is for waste: (check one) ☐ storage ☐ disposal ☒ treatment

APPLICANT (SITE)

SITE ADDRESS

APPLICANT ADDRESS

Name: Motor Oils Refining Co.

Name: Motor Oils Refining Co.

Address: 7601 W 47th St.

Address: 4803 S. Harlem

Cook 1 McCook 1 Ill 160525
(county) (community) (state) (zip)

Cook 1 Forest View 1 Ill 160402
(county) (community) (state) (zip)

9 0
6 7

1 IEPA
21 SITE CODE 03117402
22 29

USEPA
SITE CODE ILD0000646786

DISPOSAL METHOD

TREATMENT METHOD 01
30 31 32 33

STORAGE METHOD _____

Site Contact Name James T. Salmer

Telephone (312) 788-9017

The undersigned hereby makes application for a supplemental permit for the storage, treatment or disposal of this waste stream and certifies that the information referenced herein is true, correct and current.

Signature [Signature]
(Owner/Authorized Agent)

Signature James T. Salmer
(Operator/Authorized Agent)

DATE 03/17/82

FOR
AGENCY USE

STATUS

START DATE

EXPIRATION DATE

34

35

40

41

46

WASTE GENERATOR INFORMATION

PLANT ADDRESS

MAILING ADDRESS

Name: Mobil Oil Corp.

Name: Mobil Oil Corp.

Address: 3801 S Cicero

Address: 3801 S Cicero

Cook 1 Cicero 1 Ill 160650
(county) (community) (state) (zip)

Cook 1 Cicero 1 Ill 160650
(county) (community) (state) (zip)

Generator IEPA Code: 0310510008 G
25 35

Generator USEPA Code: ILD0000815357

Generator Contact Name: ED STIEBEN
36

Telephone (312) 652-8205

Process/Operation Name: LABORATORY
21

Process Description: Lab samples & those solvents used in analysis
are collected in a 1000 gal storage tank.

Generic Waste Name: LUBE OIL & TRACE SOLVENTS
51

(FOR AGENCY USE) L P S W C WASTE STREAM NUMBER 921158 TRANS CODE 14 DATE ENTERED 1/1/80

CARD
TYPE

WASTE CHARACTERISTICS

This waste is: (check one) ☒ Hazardous ☐ Non-Hazardous as defined by U.S.E.P.A. in the Resource Conservation and Recovery Act, and regulations adopted thereunder, and the Illinois Pollution Control Board in Title 35 - Subtitle G, Part 721.

USEPA Hazardous Waste Number(s) F002, F003, F005, D001, U154

Total Annual Waste Volume 5000 Volume Units 2 Waste Phase 3

Transport Frequency 7 Waste Class (Agency Use) 1 = CUBIC YARDS 2 = GALLONS 1 = SOLID 2 = SEMI-SOLID 3 = LIQUID 4 = GAS 5 = POWDERS

1 = ONE TIME 5 = MONTHLY
2 = DAILY 6 = BI-MONTHLY
3 = WEEKLY 7 = QUARTERLY
4 = BI-WEEKLY 8 = SEMI-ANNUALLY

COMPONENT NAME	PERCENT	COMPONENT NAME	PERCENT
1 LUBE OIL	95.0	2 PARAFFINIC SOLVENTS	4.0
3 ALCOHOLS	1.0	4	
5		6	

Flash Point 90°F Percent Acidity 38 Percent Alkalinity 41 pH 43 Total Solids 47
Solid Waste: Fire Hazard ☒ Corrosive ☐ Reactive ☐

TOTAL (ppm)		REACTIVE (ppm)	
Sulfide	1 3	Sulfide	31
Cyanide	0 1	Cyanide	
Phenol	1 4		

METAL	KEY	EP TOXICITY (ppm)	METAL	KEY	EP TOXICITY (ppm)
Ag	0 3	31	Hg	0 4	39
As	0 5		Pb	0 8	
Ba	0 7		Se	1 0	
Cd	0 9		LINDANE	1 6	
Cr	1 1		TOXAPHENE	1 8	
ENDRIN	1 5		2, 4, 5 - TP	2 0	
METHOXYCHLOR	1 7				
2, 4 - D	1 9				

Laboratory Name: Certification Number: 41 50 Reviewed by: (Agency Use) 51 53 54 56



Motor Oils Refining Company

(ILD000646786)

18 September 1981

*This 9-18-81
4 8-3-31 Hrs.
in file are
satisfactory,
Close out
NOV.
WB 9/28/81*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
Enforcement Division
Attn: Water & Hazardous Materials Compliance Section
230 South Dearborn
Chicago, IL 60604

This letter will confirm that Motor Oils Refining Company is now in compliance with item three (3) of the violations identified in the notice received 17 July 1981. Specifically, the training plan is complete and has been implemented. Initial training is complete. Records are available to verify the above.

Sincerely,

Thomas A. Hrastich
Operations Manager

TAH/d1

RECEIVED
SEP 21 1981
ENFORCEMENT DIVISION
EPA-REGION V



Motor Oils Refining Company

(ILD000646786)

3 August 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
Enforcement Division
Attn: Water & Hazardous Materials Compliance Section
230 South Dearborn
Chicago, IL 60604

Motor Oils Refining Company has taken the following action to comply with Subtitle C of the RCRA and, specifically, the violations identified in the notice received 17 July 1981.

1. Signs have been posted at entrances to the plant and along the barrier around the plant warning unauthorized personnel to keep out.
2. Operator inspections of the hazardous waste storage tank are being made. Supervisor instructions and a sample of the inspection log are included for review as attachment 1.
3. Personnel records have been corrected to show the appropriate training that effected employees have received. In addition a more comprehensive training plan and records management system is being developed to assure continued compliance with the RCRA. This should be completed and in effect by 15 September 1981.
4. Emergency equipment has been identified and listed. An inspection, testing and maintenance program for this equipment has been implemented.
5. A contingency plan has been prepared as an annex to the SPCC Plan. A copy of the contingency plan annex is included as attachment 2 for review.
6. A written operating record is being maintained consolidating the information concerning the plant's normal and occasional hazardous wastes. In addition we have begun logging special wastes

OK
cc 9-18-81
for recd.
9-21-81
mb

7601 West 47th Street McCook, Illinois 60525

General Office: Chicago [312] 242-2252 Suburban [312] 788-9017 Plant: Chicago [312] 242-2306 Suburban [312] 442-6166

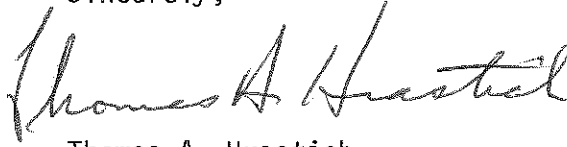
RECEIVED

AUG 5 1981

ENFORCEMENT DIVISION
EPA-REGION V

(non-hazardous) that enters the plant.

Sincerely,

A handwritten signature in cursive script, reading "Thomas A. Hrastich". The signature is written in dark ink and is positioned above the printed name.

Thomas A. Hrastich
Operations Manager

TAH/d1

MOTOR OILS REFINING CO.

Subject: Plant Inspection Plan

The Federal Government, under the EPA, has promulgated regulations concerning hazardous waste management in accordance to the Resource Conservation and Recovery Act (commonly called RCRA). These regulations state that tanks that contain hazardous waste must be visually inspected once a day to ensure that the tank is being operated correctly.

The only hazardous waste storage tank in the plant (according to EPA definitions) is the underground tank that collects the skimmings from the air flotation tank. This tank must be inspected daily by a supervisor. This inspection will include measuring the level daily by taking an outage from the top manway. Also signs of corrosion, either on the drain line, sump pump line, or on the top manway, must be noted on the inspection. The area on the other side of the dike on the north end must also be inspected for erosion of the dike or dead vegetation. Also the sump pump must be inspected to determine if it is operative.

All these observations, along with additional comments, will be recorded on a simple check sheet (Attachment I) and signed by the supervisor daily. If there are no unusual problems, check (✓) the sheet and sign it. If there is a problem mark a zero (0) and explain it in the comment section. All problems must have a work order issued to rectify the situation.

CONFIDENTIAL

The following information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past.

The following information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past.

The following information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past. This information was obtained from a confidential source who has provided reliable information in the past.

Attachment I

Inspection of floc underground storage tank - North End

Month & Year _____

<u>Date</u>	<u>Level (Outage), Ft. In.</u>	<u>Problems (✓ or 0)</u>	<u>Signature</u>	<u>Comments</u>
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				

Note: Inspect for corrosion of lines, manway, and surrounding dike. Also check if sump pump is operative. If OK mark (✓), if not, mark (0) and explain in comment section. Use back of sheet if necessary.

RCRA Contingency Plan

Plant EPA I.D. Number: ILD 000646786
Hazardous Waste Generating, Storage, and
Treatment Facility

I. General Plan Of Action

In the event of any emergency involving the handling of RCRA defined hazardous wastes, the following steps must be taken.

A. Notification1. Local authorities.

- a. In case of fire (McCook Fire Dept.) 447-1235 or direct alarm.
- b. In case of injury
 1. Ambulance/Police (McCook) 447-1231
 2. Community Hospital (LaGrange) 352-1200
 3. Dr. Slezak 325-8225

2. Plant authorities

- a. RCRA Emergency Coordinator
Brian D. McEwan Work 442-6166 ext. 10
Home Non-responsive
- b. Alternate Coordinator
Thomas A. Hrastich Work 442-6166 ext. 7
Home Non-responsive
- c. In case of implementation of the contingency plan he must notify the National Response Center (800-424-8802). If there is a release into the river, the Coast Guard must be alerted (353-8064). Also a written report must be filed with The Regional Administrator within 15 days.

B. Arrangement with Local Authorities

All the above local authorities have either formally or informally agreed to help with any plant emergencies. The mentioned fire department and police are designated as primary emergency authorities. All other local authorities that may get called in by the primary authorities, will act as support to the primary authorities.

II. Specific Plan Of Action

Currently, the only hazardous waste that is stored on site is dissolved air flotation floc. This waste is non-flammable.

A. Equipment:

Nearby the underground tank is a supply of water for fighting fires either directly or indirectly associated with the tank. Also there are fire extinguishers nearby and a safety shower adjacent to the underground tank. Emergency and safety equipment are described in Tables 1 and 2. This equipment receives a monthly inspection.

Clay and gravel is readily available for making temporary dikes in the event of a spill. The plant or an outside contractor can use its vacuum trucks for picking up a spill.

B. Procedures

In the event of an actual or threatened spillage from the underground floc storage tank, every effort should be taken to contain and minimize the volume of lost material. First the water transfer pump must be shut down to stop any floc from entering the tank. Likewise the caustic, alum and polymer additions must be stopped. A temporary dike must be installed for spill containment. Vacuum trucks can be used to pick-up the spill for transportation to an approved landfill.

III. Evacuation Routes

There are two entrances to the plant. The main entrance is off of 47th street, while the other is by the tracks in the southwest corner of the plant. In case of fire or flood where evacuation may be necessary, office personnel will be evacuated immediately. Essential plant personnel must shut down the plant in safe and efficient manner and then proceed with evacuation if necessary.

All evacuation should take place out the main entrance to the plant. If this exit is blocked because of fire, then employees must proceed to the railroad entrance gate (southwest corner) and proceed down the tracks until they reach safety.

A plant public address system is available to announce the evacuation and direct personnel to safety.

IV. RCRA Emergency Coordinator

Coordinator: Brian D. McEwan

Plant Engineer

Home address:

Home phone:

Phone 442-6166 Ext. 10

Non-responsive

Non-responsive

Non-responsive

Alternate: Thomas A. Hrastich
Operations Manager
Home address:

Phone 442-6166 Ext. 7

Non-responsive

Non-responsive

Home phone:

Non-responsive

Table 1
Safety Equipment Inspection
 Month & Year _____

<u>Item</u>	<u>Location</u>	<u>Condition</u>
Fire extinguisher	Laboratory	
Fire extinguisher	West side of office building	
Fire extinguisher	East side of warehouse	
Fire extinguisher	South tracks	
Water turret nozzle	South of old dehydrator	
Sprinkler system (localized)	Blending building	
Fire hose	Blending building	
Fire extinguisher	Blending Building - North Wall	
Sprinkler system (localized)	Filter house	
Sprinkler system (deluge)	Unit	
Fire extinguisher	Unit (Boiler room west wall) (Boiler room north wall)	
Fire extinguisher	Unit - 1st Floor	
Fire extinguisher	Unit - 2nd Floor	
Fire extinguisher	Unit - 3rd Floor	
Fire extinguisher	Unit - 4th Floor	
Fire extinguisher	Unit - 5th Floor	
Fire extinguisher	T-1 pump house	
Fire extinguisher	T-4 pump house	
Fire extinguisher-2 wheeler	North wall T-1 pump house	
Fire hose	Outside east wall clay room	
Water turret nozzle	East fence near tk. 114	
Fire extinguisher	South entrance to shop	
Fire blanket	Near time clock	

Table 1

Safety Equipment Inspection

Month & Year _____

<u>Item</u>	<u>Location</u>	<u>Condition</u>
Safety shower	South of agitators	
Safety shower	Outside green house - North end	
Safety shower	Blending Building - South end of dock	
Portable self contained breathing apparatus	Inside equipment cage area	
Air masks (2) for big air bottles	Maintenance area	
Fire alarm	Outside lab door	

Table 2

Safety Equipment Capabilities

Item	Capabilities
Fire extinguisher	Can deliver approximately 15 pounds of dry chemical for extinguishing A B and C type fires. Unit is portable. Unit on two wheels contains approximately 100 pounds of chemical.
Fire hose	Water pressure approximately 35 psig. Hose extends approximately 100 feet. Can deliver approximately 200 gpm of water, for extinguishing most non electrical fires.
Sprinkler system Filter House and Blending Building	Water pressure approximately 35 psig. Used for fire fighting in enclosed and difficult to reach places. Purpose is used to protect structures and vessels. Sprinklers are individually heat actuated and each nozzle can deliver about 50 gpm of water for extinguishing most non electrical fires.
Sprinkler system Unit	Water pressure approximately 35 psig. Used for fire fighting in enclosed and difficult to reach places. Purpose is to protect structures and vessels. Sprinklers are actuated by a broken air transmission line, which will actuate all sprinklers in the system. Can deliver approximately 1000 gpm of water for extinguishing most non electrical fires.
Water turret nozzle	To be used to direct a steady flow of water at a specific area. Turret adjusts up and down and rotates 360 degrees. Meant to aid in fire fighting without utilizing a man to hold it.
Fire blanket	Used to protect personnel from heat and flame exposure especially in the case of an accident or injury.
Safety shower	To be used to wash corrosive chemical off of employees clothes or eyes. To be used in an emergency when spills and splashes of chemicals occur.
Breathing units	Both units to be used when working in a toxic atmosphere or in case of a release of toxic gases. Portable unit supplies approximately 10-15 minutes of air; while larger air bottles can supply two men working for 1/2 to 1 hour.

THE UNIVERSITY OF CHICAGO

CHICAGO, ILLINOIS

CHICAGO, ILLINOIS

TO THE PRESIDENT OF THE UNIVERSITY OF CHICAGO
FROM THE FACULTY OF THE UNIVERSITY OF CHICAGO
RESOLUTION OF THE FACULTY OF THE UNIVERSITY OF CHICAGO
PASSED AT A MEETING OF THE FACULTY HELD AT CHICAGO, ILLINOIS, ON

CHICAGO, ILLINOIS

APRIL 1, 1954
THE FACULTY OF THE UNIVERSITY OF CHICAGO
RESOLUTION OF THE FACULTY OF THE UNIVERSITY OF CHICAGO
PASSED AT A MEETING OF THE FACULTY HELD AT CHICAGO, ILLINOIS, ON

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CHICAGO, ILLINOIS

Table 2

Safety Equipment Capabilities

Item	Capabilities
Fire alarm	To be used to alert plant personnel and the fire department of a fire or some other immediately hazard.

RECEIVED

APR 1964

RECEIVED

Safety Equipment Capabilities

Table 2

To be used to alert plant personnel and the
fire department of a fire or some other
immediately harmful

Fire alarm

RECEIVED

AUG 5 1981

ENFORCEMENT DIVISION
EPA-REGION V

17 JUL 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEWHME

Kenneth Fredette, Plant Administrator
Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

RE: Motor Oils Refining Company
McCook, Illinois ILD000646786

Dear Mr. Fredette:

Notice is hereby given that the United States Environmental Protection Agency (U.S. EPA) has determined that the above facility is in violation of requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. Specifically it has been determined that Motor Oils Refining Company is in violation of Section 3004 of RCRA (42 USC 6924).

On April 10, 1981, a representative of the Illinois Environmental Protection Agency (IEPA) inspected your facility at 7601 West 47th Street, McCook, Illinois. The report is forwarded for your information. The purpose of this inspection was to determine your facility's compliance status with RCRA. The inspector found that:

- 8-3-81 ^{ok} 1. Danger signs are not posted at entrance to the active portion of the facility. This is in violation of 40 CFR 265.14(c).
- 9-3-81 ^{ok} 2. Owner or operator inspections are not conducted. This is in violation of 40 CFR 265.15(a)(b)(c) and (d).
- See 8-3-81 ^{ok} + 9-18-81 _{ltro.} 3. Personnel training records do not include a description of the training. This is in violation of 40 CFR 265.16(d)(3). We remind you that records documenting that training has been given to and completed by facility personnel must be available at your facility in accordance with 40 CFR 265.16(d)(4) and 265.16(e).
- 8-3-81 ^{ok} 4. Emergency equipment testing and maintenance procedures are not established. This is in violation of 40 CFR 265.33.
- 8-3-81 ^{ok} 5. Contingency plan does not contain information regarding arrangements agreed to by the local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. Also, it does not include a list of all emergency equipment at the facility which includes the locations and physical description of each item on the list and a brief outline of its capabilities, and an evacuation plan for facility personnel. This is in violation of 40 CFR 265.52(c)(e) and (f). In addition, your Spill Prevention, Control, and Countermeasures (SPCC) Plan needs to be amended to incorporate hazardous waste management provisions pursuant to 40 CFR 265.52(b).

6. A written operating record is not maintained at the facility. The record must contain information regarding a listing of the location and quantity of each hazardous waste within the facility, a record and results of all waste analyses, trial tests, monitoring data, and operator inspections. Information is required regarding the methods and date of each waste's treatment, storage, or disposal (see page 33252 of the May 19, 1980, Federal Register, Appendix I). This is in violation of 40 CFR 265.73(a) and (b), (1), (2), and (3).

You are hereby requested to provide documentation to this office, within 15 days after receipt of this Notice of Violation, informing us of action taken to correct these violations. Please address such documentation to U.S. Environmental Protection Agency, Enforcement Division, Attention: Water & Hazardous Materials Compliance Section, 230 South Dearborn, Chicago, Illinois 60604. If you have any questions, please contact John Moran at (312) 353-2114.

Very truly yours,

Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

cc: Michael Hayes, Acting Manager
Land/Noise Pollution Control Division
Illinois Environmental Protection Agency

bcc: Constantelos/Klepitsch
Stone
Baumgartner/Lewis
Moran
John Evans, Jr., IEPA-Maywood

JMoran/ng 6-29-81/7-1-81/7-2-81 6-6715

Gingher _____
Moran _____
Baumgartner _____
Donaldson _____
Leder _____
Myers _____
Manzardo _____
Fenner _____
Klebenow _____
Gardebring _____

6. A written operating record is not maintained at the facility. The record must contain information regarding a listing of the location and quantity of each hazardous waste within the facility, a record and results of all waste analyses, trial tests, monitoring data, and operator inspections. Information is required regarding the methods and date of each waste's treatment, storage, or disposal (see page 3352 of the May 19, 1980, Federal Register, Appendix I). This is in violation of 40 CFR 265.73(a) and (b), (1), (2), and (3).

You are hereby requested to provide documentation to this office, within 15 days after receipt of this Notice of Violation, informing us of action taken to correct these violations. Please address such documentation to U.S. Environmental Protection Agency, Enforcement Division, Attention: Water & Hazardous Materials Compliance Section, 230 South Dearborn, Chicago, Illinois 60604. If you have any questions, please contact John Moran at (312) 353-2114.

Very truly yours,

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

cc: John S. Moore, Manager
Land/Noise Pollution Control Division
Illinois Environmental Protection Agency

bcc: Constantelos/Klepitsch
Stone
Baumgartner/Lewis
Moran
John Evans, Jr., IEPA-Maywood

JMoran/ng 6-29-81/7-1-81 6-6715

Gingher N.J. 7-1-81
Moran jm 7-1-81
Baumgartner NBS 7/6/81
Donaldson td
Leder AL
Myers jm 7/8
Manzardo AM
Fenner AF
Klebenow _____
Gardebring _____

6. A written operating record is not maintained at the facility. The record must contain information regarding a listing of the location and quantity of each hazardous waste within the facility, a record and results of all waste analyses, initial tests, monitoring data, and operator inspections. Information is required regarding the methods and date of each waste's treatment, storage, or disposal (see page 3325 of the May 19, 1980, Federal Register, Appendix I). This is in violation of 40 CFR 265.73(a) and (b). (1), (2), and (3).

You are hereby requested to provide documentation to this office, within 15 days after receipt of this Notice of Violation, informing us of action taken to correct these violations. Please address such documentation to U.S. Environmental Protection Agency, Enforcement Division, Attention: Water & Hazardous Materials Compliance Section, 230 South Dearborn, Chicago, Illinois 60604. If you have any questions, please contact John Moran at (312) 353-2114.

Very truly yours,

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

cc: John S. Moore, Manager
Land/Waste Pollution Control Division
Illinois Environmental Protection Agency

cc: Constantinos Kleitsch
Stone
Baumgartner/Lewis
Moran
John Evans, Jr., IEPA-Maywood

Moran/ing 6-29-81/7-1-81 6-6715

Gingher, D.A. 7-1-81
Moran 7-1-81
Baumgartner 7/6/81
Donaldson
Leder
Myers 7/8
Manzard
Fenner
Kleponow
Gardebring

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: JUL 17 1981

SUBJECT: ISS Inspection Review Sheet

FROM: *Arnold E. Leder*
Arnold E. Leder, Chief
Compliance Section

TO: *Michael Hayes, Acting Manager*
Land, Noise Pollution Control Division
Illinois Environmental Protection Agency

Name: *Motor Oil Refining Company*

Date of Survey: *April 10, 1981*

Location: *McCook, Illinois*

Date Report Received in Enforcement Division *May 28, 1981*

EPA ID No.: *FCD 000 646786*

Date Reviewed and Reviewers

Initials *June 16, 1981 Jm*

GENERATOR

TRANSPORTER

TSD

Inspection Conducted By: ☐ 1. State ☐ 2. U.S. EPA ☐ 3. Joint
☐ 4. Other _____

COMMENTS ON INSPECTION

Listing of the inspector mailing address would be beneficial for mailing purposes.

ANALYSIS OF REPORT

☐ 1. In Compliance

☒ 2. Non-Compliance with Interim Status Standards (Describe)

1. *Danger signs not posted at the facility.*
2. *Inspection by operator do not record information about malfunctions, operator error, discharges, inspection schedule, safety & emergency equipment, security devices, operating and structural devices, and a log of inspections.*
3. *Personnel training records do not include a description of training.*
4. *Contingency plan does not contain established testing and maintenance procedures for emergency equipment.*

FINAL ACTION TAKEN WITH REPORT

☐ 1. In Compliance; no further action.

☐ 2. No further action (e.g. insignificant violation, mitigating circumstances as described as follows). _____

☒ 3. State/Federal enforcement action taken. (Describe) *Letter attached*

☐ 4. Copy of inspection with attached letter sent to facility by State/Federal.

cc: State SIO

$$\frac{\underline{\text{L}}}{(1)} \frac{\underline{\text{P}}}{(1)} \frac{\underline{\text{C}}}{(1)} \frac{\underline{\text{F}}}{(1)} \frac{\underline{\text{C}}}{(1)} \frac{\underline{\text{O}}}{(1)} \frac{\underline{\text{S}}}{(1)} \frac{\underline{\text{S}}}{(8)} \frac{\underline{\text{C}}}{(9)}$$

(11) ————— (18)

Region # 25

Date 04 / 10 / 2021
(20) _____ (25)

Letter Sent (Yes or No)
(26)

(Location)		(Responsible Party)	
Samples Taken:	Yes () No ()	Time:	From 08 : 45 a.m.
Ground Water()	Surface() Other()	To	7: 55 a.m.
Photos Taken:	Yes () No ()	Interviewed	7: 55 a.m.

Weather 57 Partly Cloudy

Inspector (27) (29)

Previous Inspection 3-18-81 Previous Correspondence — Site Open: Yes() No()

<u>OPERATIONAL STATUS:</u>	<u>TYPE OF OPERATION:</u>	<u>AUTHORIZATION:</u>
Operating ()	Landfill ()	E.P.A. Permit ()
Temporarily Closed ()	Random Dump ()	Variance ()
Closed Not Covered ()	Other S.T.P. ()	21(e) ()
Closed and Covered ()	Quantity Received Daily(1-6)	Board Order ()
	(30)	Illegal (5) ()
IMPROVED		(31)

IMPROVED

SAME

DETERIORATED

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

I S or D 5
(62)

GENERAL REMARKS: Motec Oils Refining's facility Refines used lubricating oils and blends this oil into various oil products. The facility also has a special waste site that presently does not collect used R.O.O. However due to Motec's process the site is not a hazardous waste (H.W.) tank either. Material from the petroleum Refining industry Motec has also listed its Refining waste Special handling. Risk that this oil is not to be released then not generate such

INTERVIEW: The site has received its operating permit from the State CCR and has maintained general compliance with the State Rules and fees. The R.C.R.A. inspection disclosed the following violations at a March meeting at the R.C.R.A. Boardroom:

Major was lacking the following: operating Wye station Board and documentation of training testing and maintenance of safety equipment, listing of employees, equipment, excavation permits, etc. of their S.P.C. plan and any type of operating Board.

DIAGRAM:

[illegible]



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

out 10-7-81

REPLY TO ATTENTION OF:

5AHWM

Mr. James T. Salmon
Environmental Coordinator
Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

Dear Mr. Salmon:

Thank you for your letter of October 1, 1981, in which you requested clarification of the applicability of the listed petroleum refining wastes, K048 through K052, to the re-refining of used oils. The re-refining of used oil is not included under the classification of petroleum refining because the feedstock is a used refined product and not crude oil. Consequently, hazardous wastes K048 through K052 do not apply to your operation.

If you have any further questions regarding the listing or identification of hazardous waste, please feel free to contact Mr. Greg Weber of my staff at 312/886-3730.

Sincerely,

Y. J. Kim, Chief
Process Evaluation Unit

*D002 - community
D008 - lead*

03/174 02
STATE IDENTIFICATION NUMBER
(If Applicable)

✓
IL 7000646786
EPA IDENTIFICATION NUMBER

1980-2-08

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

RECEIVED

APR 17 1981

I. General Information:

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

- (A) Facility Name: MOTOR OILS Refining Co
(B) Street: 7601 WEST 47th
(C) City: McCook (D) State: IL (E) Zip Code: 60525
(F) Phone: 312-242-2252 (G) County: Cook
(H) Operator: KEW FREDETTE (Plant Admin)
(I) Street: SAME AS ABOVE
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: HARRY LITWIN AND ASSOCIATES
(P) Street: P.O. Box 282
(Q) City: WICHITA (R) State: KANSAS (S) Zip Code: 67201
(T) Phone: 316-265-0731 (U) County: _____
(V) Date of Inspection: Apr 10, (W) Time of Inspection (From) 9:00A (To) _____
(X) Weather Conditions: Warm, Partly Cloudy

Inspection consists of
pages 1 then 11 and 19 and 20
And Comment page

RECEIVED

1917

1917
State of Illinois

(Y) Person(s) Interviewed

KEN FREDETTE

Title

Plant Admin

Telephone

708-9017

(Z) Inspection Participants

John EVANS Jr

Agency/Title

ICPA/E.P.S.

Telephone

315-9780

(AA) Preparer Information

Name

John EVANS Jr

Agency/Title

E.P.S.

Telephone

315-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- 2 A. Storage and/or Treatment
1. Containers (I)
 2. Tanks (J)
 3. Surface Impoundments (K)
 4. Waste Piles (L)

 B. Land Treatment (M)

 C. Landfills (N)

 D. Incineration and/or Thermal Treatment (O and P)

 E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

10-10-1964

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(Part 265 Subpart B)

Yes	No	NI*	Remark
-----	----	-----	--------

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source?
2. Facility expansion?

(B) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

STATE Supplemental permits

GENERATES HAZ WASTE ONLY
~~DOES NOT ACCEPT~~
WASTE FROM OFF SITE

(C) Security - Do security measures include:
(if applicable)

1. 24-Hour surveillance?
2. Artificial or natural barrier around facility?
3. Controlled entry?
4. Danger sign(s) at entrance?

night workers

(D) Do Owner or Operator Inspections Include:

1. Records of malfunctions?
2. Records of operator error?
3. Records of discharges?

Not Inspected

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RE: THE UNIVERSITY OF CHICAGO
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DATE RECEIVED
JAN 10 1970

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DATE RECEIVED

JAN 10 1970

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THE UNIVERSITY OF CHICAGO

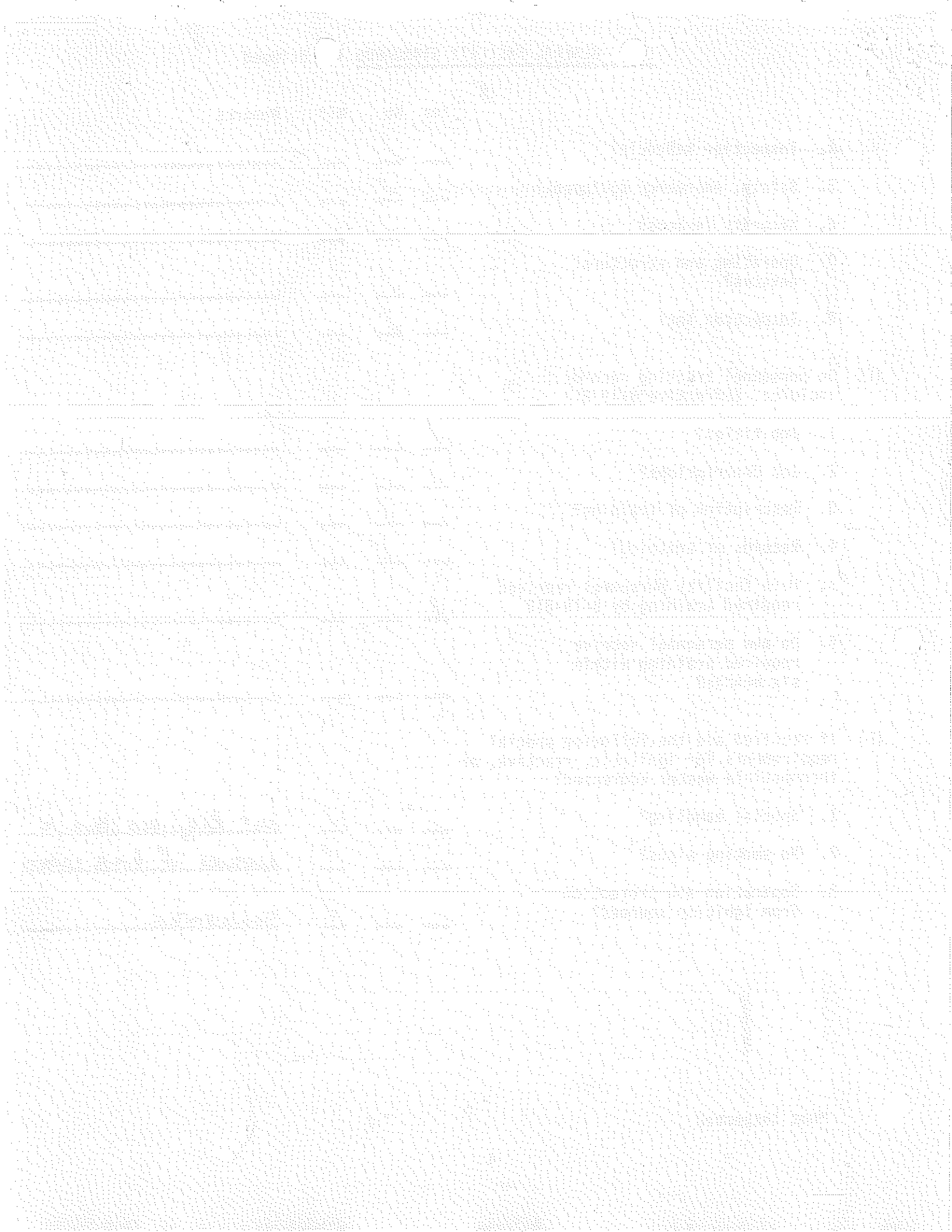
LIBRARY

DATE RECEIVED

I GENERAL FACILITY STANDARDS - continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NOT Required Due to
2. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NATURE OF HAZ WASTE
3. Separation and protection from ignition sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	GENERATED:

*Not Inspected



IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— ✓ —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

✓ — —

2. Telephone or 2-way radios
at the scene of operations?

✓ — —

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ — —

Indicate the volume of water and/or foam available for fire control:

Five mains inside & outside, Extinguishers

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

— ✓ —

2. Is emergency equipment
maintained in operable
conditions?

✓ ~~✗~~ —

Equipment (i.e. fire extinguishers, ARE INSPECTED EVERY SO OFTEN & TAG AS SUCH Although this procedure is Required by Fire Department.

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

✓ — —

*Not Inspected

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LIBRARY

1215 EAST 58TH STREET
CHICAGO, ILL. 60637
TEL. 773-936-5000

BOOKS ARE AVAILABLE FOR
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UNIVERSITY OF CHICAGO

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STUDENTS OF THE
UNIVERSITY OF CHICAGO

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AT 773-936-5000

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AT WWW.CHICAGO.EDU

LIBRARY

(E) Is there adequate aisle space for unobstructed movement?

✓ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓ _____

7 yrs old S.P.C.C. Plan
Needs to be update
with R.C.R.A
Requirements

✓ _____

Old copy, 3 without
of S.P.C.C. updated

✓ _____

_____ ✓ _____

_____ ✓ _____

*Not Inspected

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V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>copies of SPOC</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>NO manifest discrepancy AT This time</u>

*Not Inspected

THE UNIVERSITY OF CHICAGO
LIBRARY

100 EAST 57TH STREET
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(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

2. Does the operating record contain the following information:

- **b.** The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?



by manifests only
No actual log back

- c. The location and quantity of each hazardous waste within the facility?

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

_____ ✓

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

- g. All closure and post closure costs as applicable?
(Effective 5-19-81)

✓

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

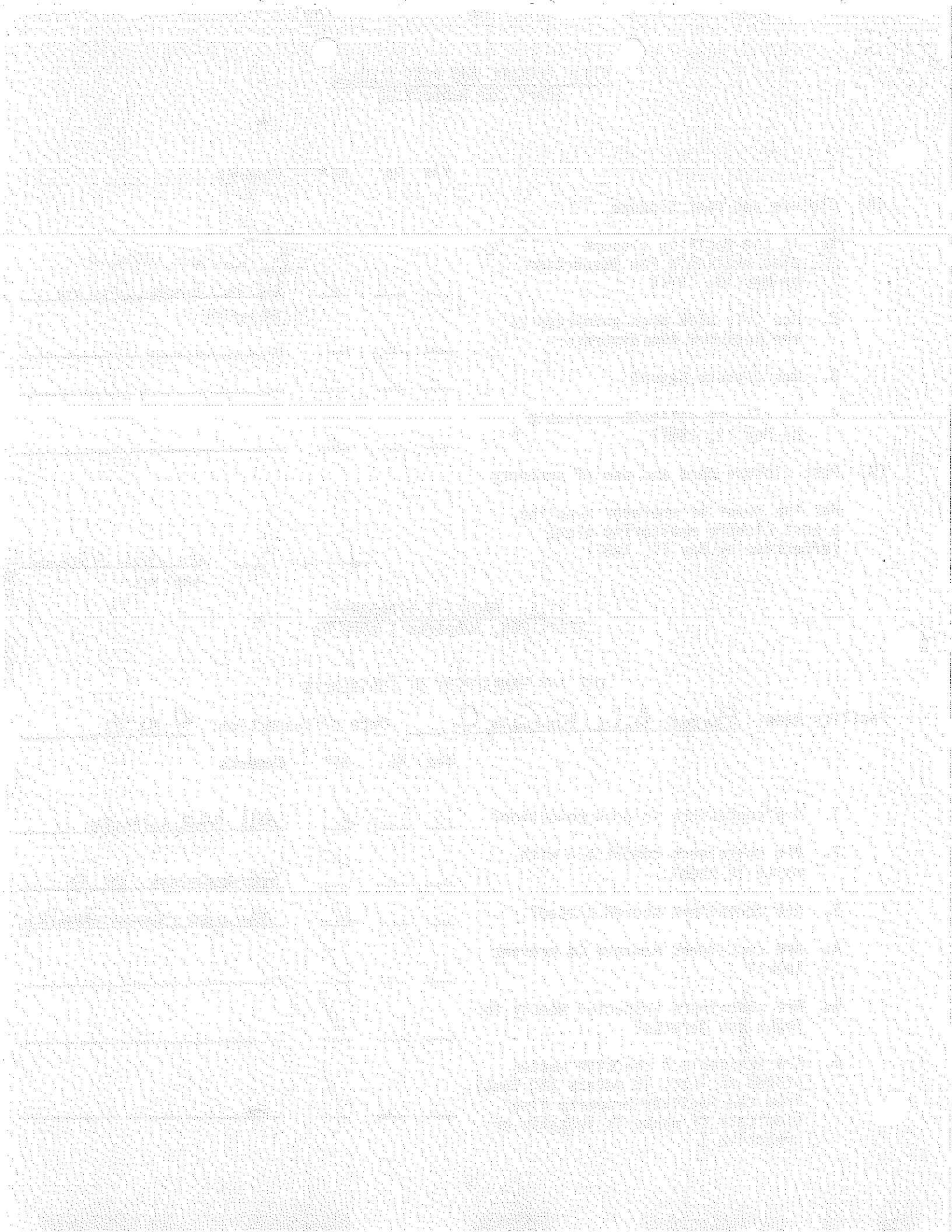
	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	—	—	✓	Co. has not drawn up a closure plan as of yet.
2. Has this plan been submitted to the Regional Administrator	—	✓	—	
3. Has closure begun?	—	✓	—	
4. Is closure estimate available by May 19, 1981?	—	—	✓	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	J	—	—	As plan drawn up yet

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Matoe Oil Refining Co. Date of Inspection: 4-10-81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	—	—	✓	ALL HAZ WASTE
2. Are containers compatible with waste in them?	—	—	✓	GENERATED IS A
3. Are containers stored closed?	—	—	✓	sludge from tanks
4. Are containers managed to prevent leaks?	—	—	✓	
5. Are containers inspected weekly for leaks and defects?	—	—	✓	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	—	—	✓	



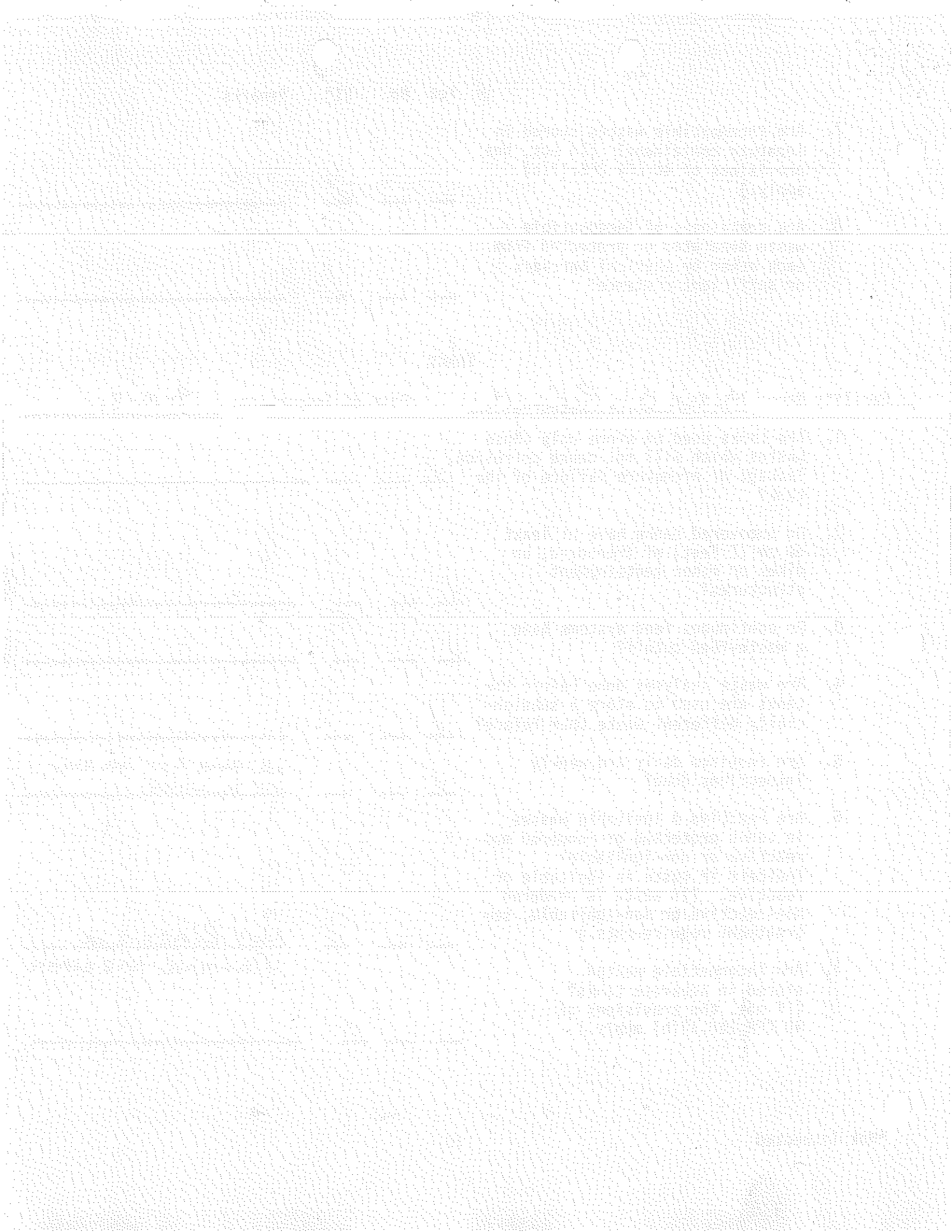
- | | Yes | No | NI* | Remarks |
|---|-----|-----|-----|---------|
| 7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) | --- | --- | ✓ | --- |
| 8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | --- | --- | ✓ | --- |

J TANKS

Facility Name: MOTOR OILS Refining Co.

Date of Inspection: 4-10-81

- | | | | | |
|--|-----|-----|-----|-------------------------------------|
| 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? | ✓ | --- | --- | --- |
| 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? | ✓ | --- | --- | --- |
| 3. Do continuous feed systems have a waste-feed cutoff? | ✓ | --- | --- | --- |
| 4. Are waste analyses done before the tanks are used to store a substantially different waste than before? | ✓ | --- | --- | --- |
| 5. Are required daily and weekly inspections done? | ✓ | --- | --- | NO TANKS ARE KEEP AS TO WHEN- |
| 6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | --- | --- | ✓ | NON REACTIVE OR FLAMMABLE HAZ WASTE |
| 7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) | --- | --- | ✓ | --- |



8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: N.A. gallons

Tank diameter: N.A. feet

Distance of tank from property line N.A. feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

MEMORANDUM FOR THE RECORD

DATE: 10/10/1964
TO: MR. TOLSON

FROM: MR. DELOACH
SUBJECT: [REDACTED]

RE: [REDACTED]
[REDACTED]

1. [REDACTED]

2. [REDACTED]

3. [REDACTED]

4. [REDACTED]

5. [REDACTED]

Yes No NI* Remarks

3. Has the owner or operator addressed the waste analysis requirements of 265.402?

4. Are inspection procedures followed according to 265.403?

5. Are the special requirements fulfilled for ignitable or reactive wastes?

6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

Yes No NI* Remarks

(A) Does the operator have copies of the manifest available for review?

✓ _____

(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)

1. Manifest document number?

✓ _____

2. Name, mailing address, telephone number, and EPA ID Number of Generator

✓ _____

10/10/1980

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	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

THE SECRETARY OF THE
TREASURY
WASHINGTON, D. C.

DEPARTMENT OF THE TREASURY

OFFICE OF THE COMPTROLLER

WASHINGTON, D. C.

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WASHINGTON, D. C.

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TREASURY
WASHINGTON, D. C.

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

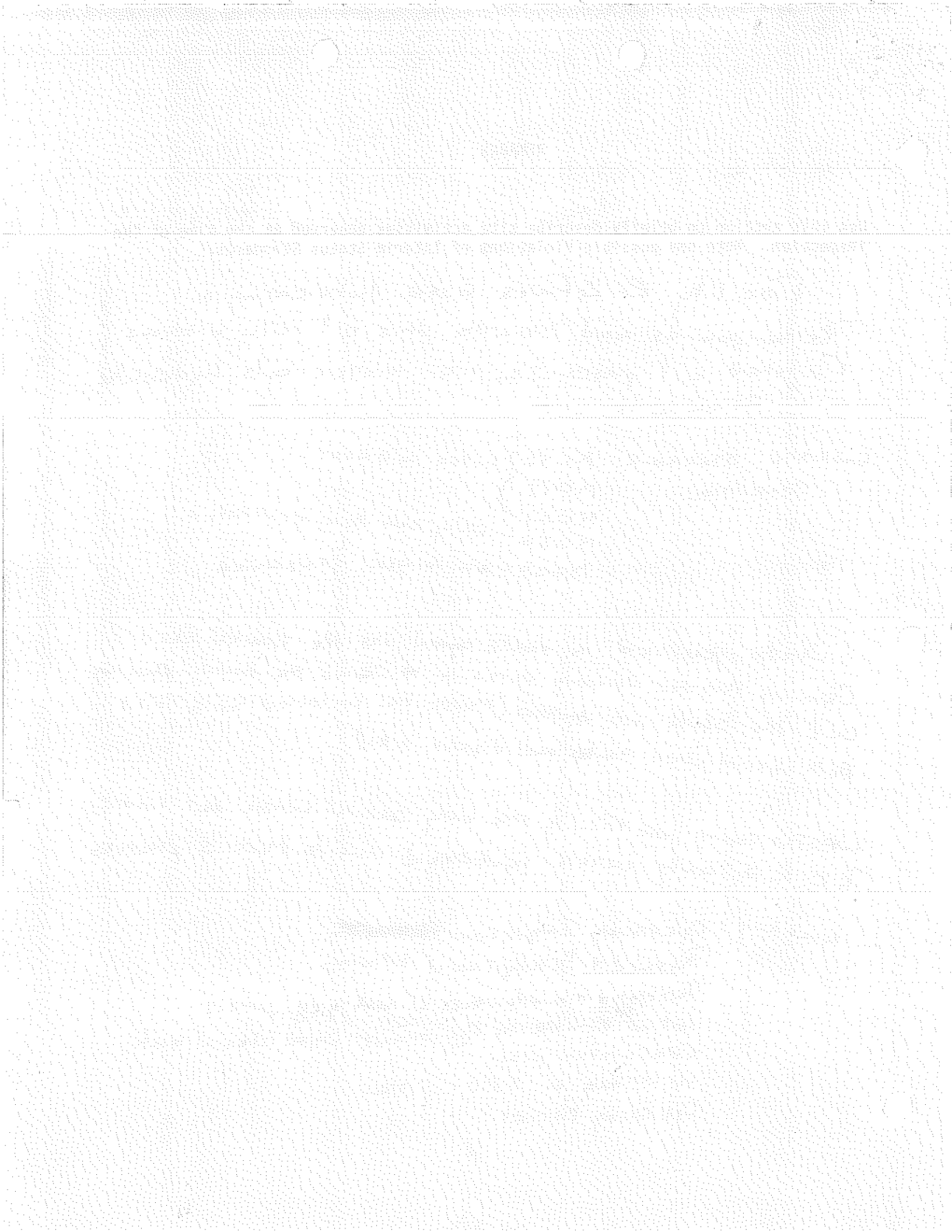
Facility Refines used lubricating oils
Recompounds and blends this oil into various
finished oil products, i.e. motor oils, hydraulic
oils, gear oils etc.

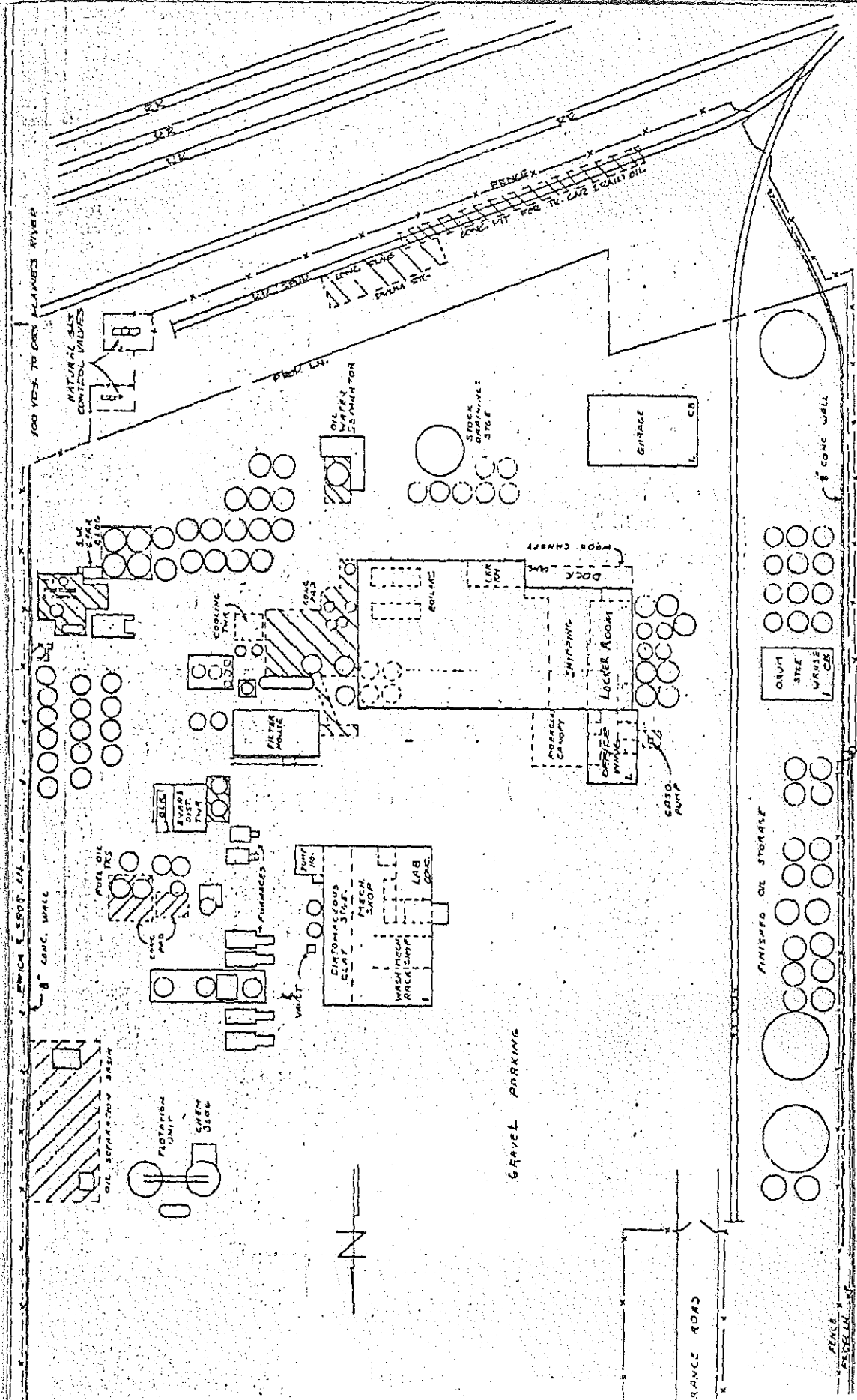
WASTE STREAMS: K048 } listed in "CASE"
GENERATED K049 }
K051 }
K052 - only one being generated
D002 - no longer generated

Sludge generated in tanks, ~~used~~ as the tank(s) need
cleaning. Another company comes in & cleans the tanks - pumping
out the sludge into tankers (Morocco has contracted C.I.D./B.F.1)
Both special waste handlers and disposal sites.

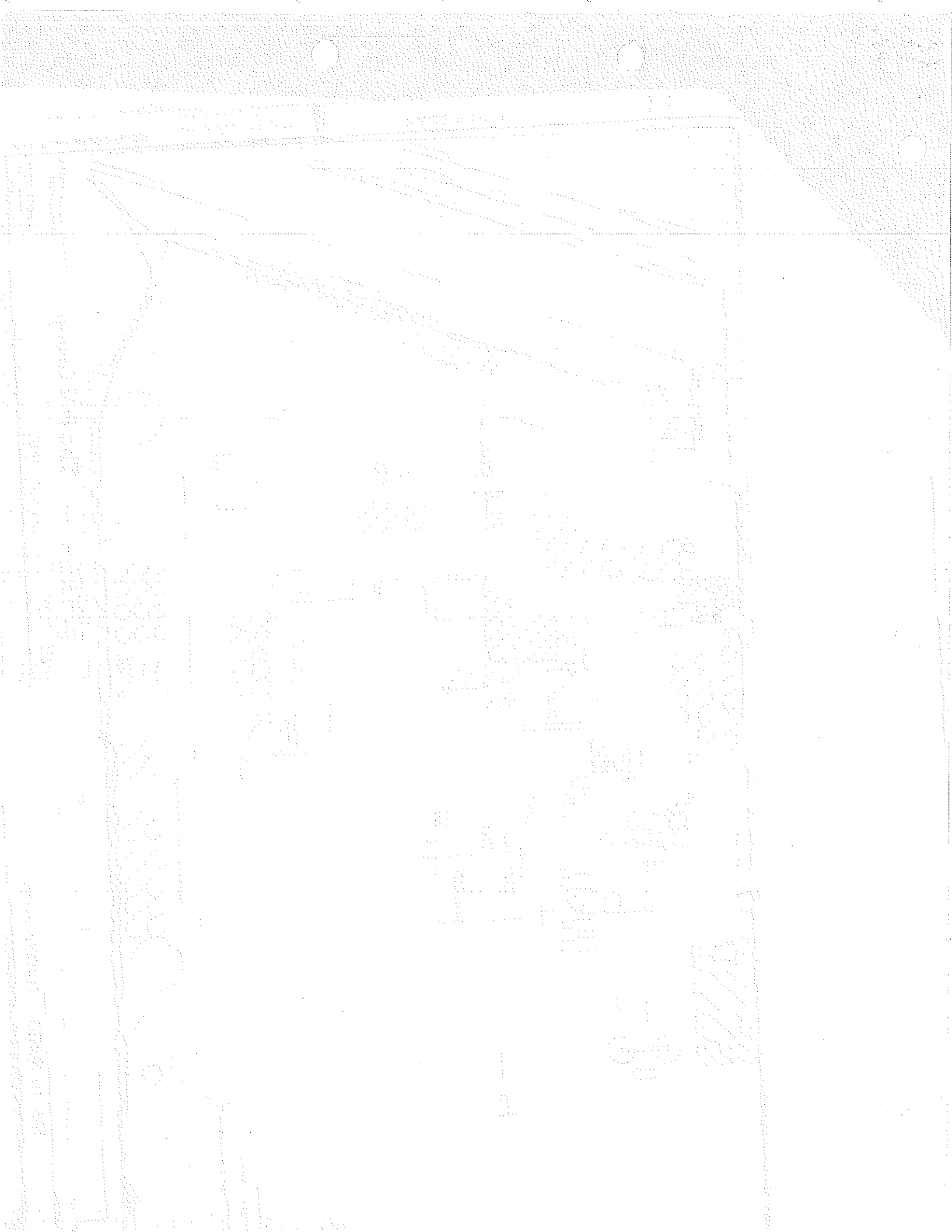
WASTES coming into facility are only special waste NOT under
R.C.R.A. only waste generated due to Morocco's process

- Lacking: OPERATING INSPECTIONS ~~RECORDS~~
Record & Description of toxicity.
Testing & maintenance of safety equipment
list of emergency equipment & capabilities of such
evacuation plan
updating of S.P.C.C. plan.
Operating Record





The EPE Group 145 RAYMOND STREET SAN FRANCISCO, CALIFORNIA 94103 TELEPHONE (415) 495-3310		FIRE PROTECTION ENGINEER CONSULTANTS	PROJ. NO. 77 DRAWING
SCALE 1" = 50' DATE 12-15-77		ESMARK, INC. UNITED CHEMICALS, INC.	
EPA ID NUMBER ILT000646786		VELMAR PVT'S WAREHOUSE	



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elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-RC-175

26



U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

FILED 0000646786 3D

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP MOTOR OILS REFINING COMPANY

IV. FACILITY CONTACT

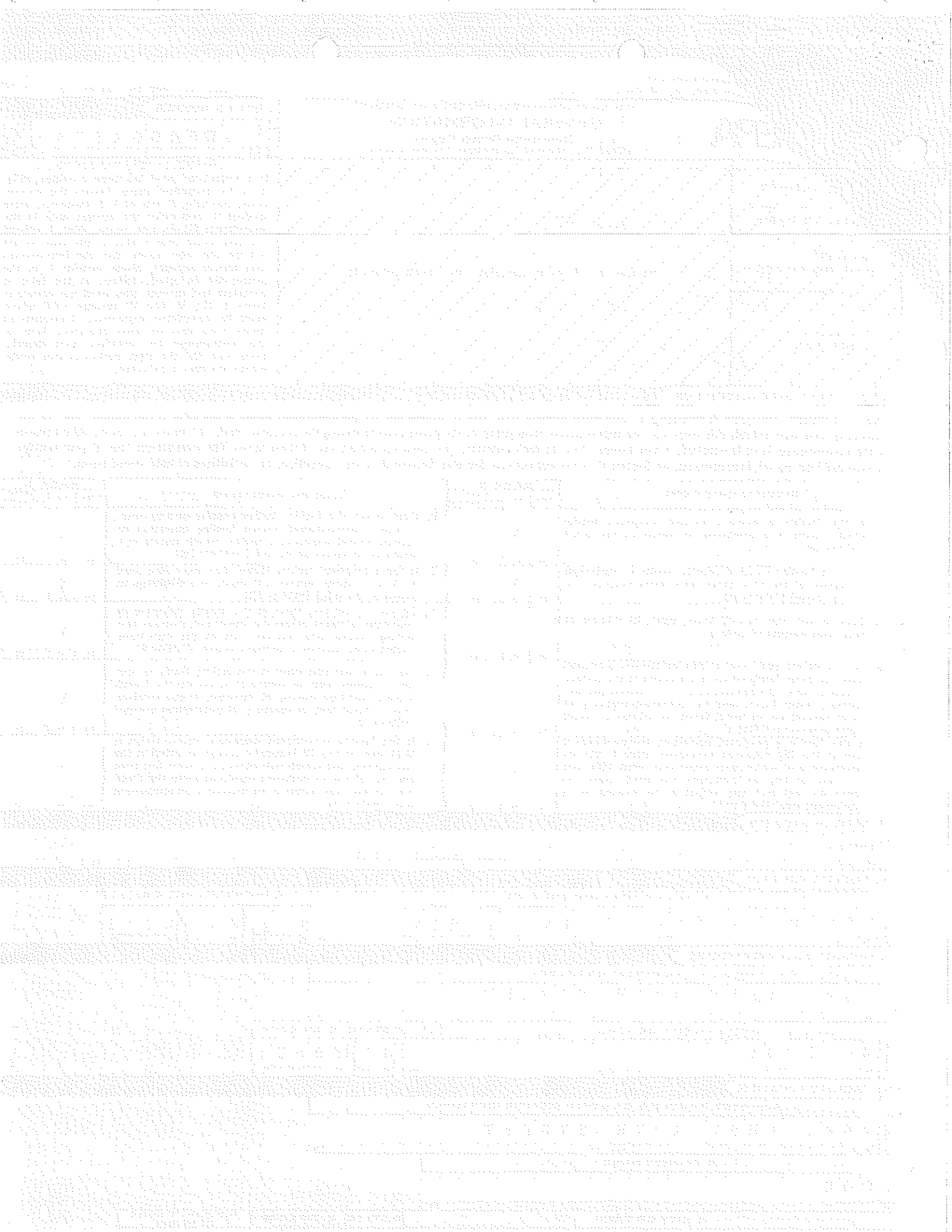
A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
2	FREDETTE KEN - PLANT ADMIN.	312	242	2252

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	7601 WEST 47TH STREET			IL	60525
4	MC COOK				

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	7601 WEST 47TH STREET		COOK				



CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND														
C	7	9	1	1	(specify) Lube Oil Re-refinery						C	7	(specify)											
15	16	17	18	19											15	16	17	18	19					
C. THIRD										D. FOURTH														
C	7	(specify)									C	7	(specify)											
15	16	17	18	19											15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																																																		B. Is the name listed in Item VIII-A also the owner?									
C	8	MOTOR OILS REFINING COMPANY																																																<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
15	16																																																	66									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)																													
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC (other than federal or state) O = OTHER (specify)																														P (specify)																													
P																														A 3 1 2 2 4 2 2 2 5 2																													
35																														15 16 17 18 19 20 21 22 23 24 25																													
E. STREET OR P.O. BOX																																																											
7601 WEST 47TH STREET																																																											
26																																																											
F. CITY OR TOWN																														G. STATE										H. ZIP CODE										IX. INDIAN LAND									
B MC COOK																														I L										60525										Is the facility located on Indian lands?									
15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52																														52										<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																			

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
C	9	N													C	9	P	031-174-ARE											
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40				
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
C	9	U													C	9	031-174-02 (specify) ILL. EPA LAND PERMIT												
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40				
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
C	9	R	ILT-000646786												C	9	1980-2-OP (specify) ILL. EPA OPERATING PERMIT												
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40				

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

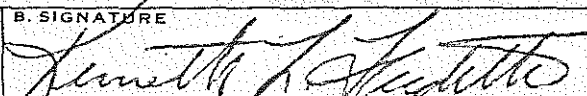
XII. NATURE OF BUSINESS (provide a brief description)

Facility re-refines used lubricating oils. Recompounds and blends this oil into various finished lube oil products, i.e., motor oils, hydraulic oils, gear oils, etc.

F9: A/51

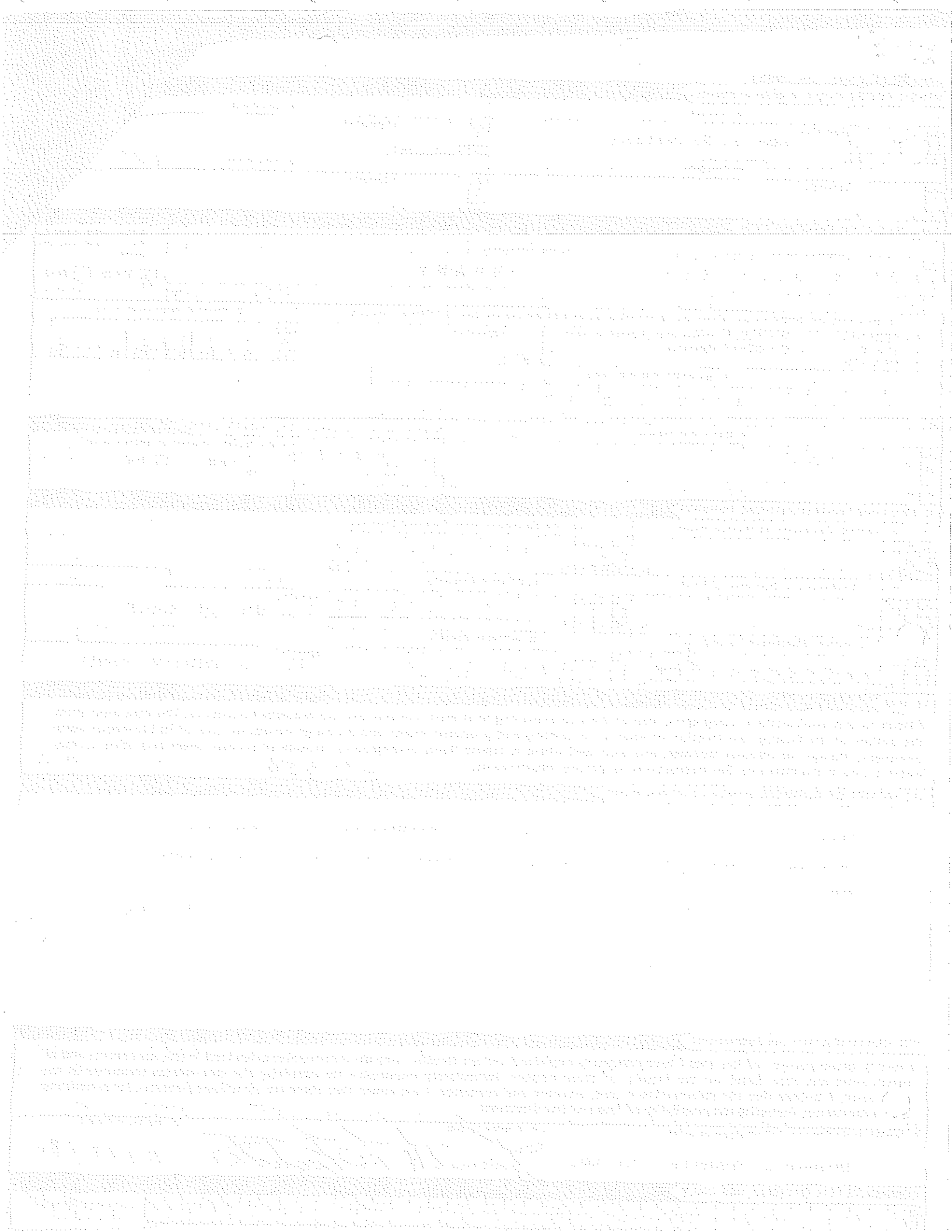
XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)																				B. SIGNATURE																				C. DATE SIGNED									
Kenneth L. Fredette - Plt Adm.																																								11/17/80									

COMMENTS FOR OFFICIAL USE ONLY

C																																																	
C																																																	



shaded areas only
elite type, i.e., 12 characters/inch.

Form Approved OMB No. 158-S80004

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

FILED 00064678631

USE ONLY

DATE RECEIVED
(yr., mo., & day)

13	24	29
----	----	----

COMMENTS

FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

Treatment:

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V
LITERS	L	TONS PER HOUR	D
CUBIC YARDS	Y	METRIC TONS PER HOUR	W
CUBIC METERS	C	GALLONS PER HOUR	E
GALLONS PER DAY	U	LITERS PER HOUR	H

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP 31

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			
X-1	S02	600	G		5	T
X-2	T03	3366.000	E		6	F
	S01	5000000	G			
2	S02	2,500,000	G		8	
3					9	
4					10	

NOTE: HAZARDOUS WASTE PERMIT APPLICATIONS MUST BE COMPLETED BY THE FACILITY OPERATOR. THE EPCRA 112(d)(1) REQUIREMENT FOR CORROSIVITY TESTING OF LIQUID WASTES APPLIES TO ALL LIQUID WASTES THAT ARE CORROSIVE ONLY AND TO ALL LIQUID WASTES THAT ARE CORROSIVE AND TOXIC. REPEAT STEP 2.

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

EPA Form 3510-3 (6-80)

Continued from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTER INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

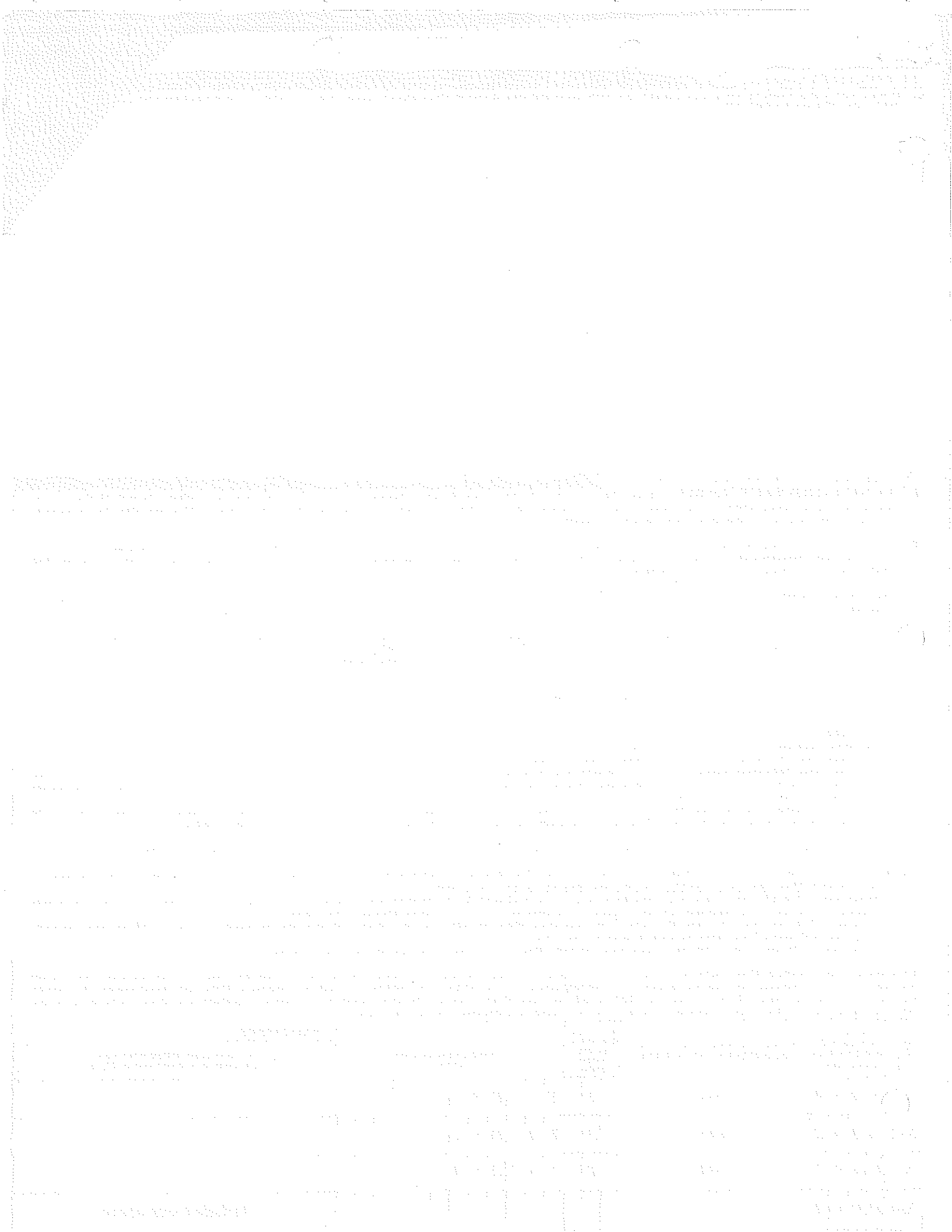
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above



ENDUM

Motor Oils Refining Company is engaged in the business of re-refining used lubricating oils. We have capacity to produce approximately fifteen million gallons per year of re-refined lubricants. We use a re-refining treatment or process which utilizes tanks and distillation and processing vessels and other auxiliary equipment to accomplish this. It is our present understanding that this operation should not be listed on the attached EPA forms in that where material fed into a recycling operation, such material are excluded from such registrations. If, however, this interpretation is not right, we have included the required information to have such an operation listed and registered with the EPA.

The capacity of our facility expressed as used lubricating oil input to our operation is approximately twenty million gallons per year based on what we feel is an average used oil quality. We have listed on the attached forms the waste which we generate at our facility which we feel come under the EPA reporting system. The above mentioned re-refining process and the used oil refining capacity are only included in this attachment.

If required, add the following:

- | | |
|----------|--------------------------------------|
| ITEM III | A. T01, T04 |
| | B.1 60,000,000 |
| | B.2 U |
| ITEM IV | A. D008 |
| | B. 20,000,000 999,999,999 |
| | C. Y |
| | D.1 T04 (Re-refining System) |

Page before completing if you have more than 26 wastes to list

Form Approved OMB No. 158-S80004

WASTE NO. (enter from page 1)

FOR OFFICIAL USE ONLY

0064678631

W

DUP

32

DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
			1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1 K048	100,000	G	T01	
2 K049	1,000	G	T01	
3 K050	1000	G	T01	
4 K051	2000000	G	T01	
5 K052	1200000	G	T01	
6 D002	1560000	G	T01 T04	
7	99999999			
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IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	0	0	6	4	6	7	8	6	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). *FG:A/SS*

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). *FG:B/56*

I. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

8	7	4	8	4	0	0
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

0	4	1	4	8	1	3	8
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	HARRY LITWIN AND ASSOCIATES	3	1	6	-	2	6	5	-	0	7	3	1
13	14		55	56	57	58	59	60	61	62	63	64	65	66

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	P. O. BOX 282	C	G	WICHITA	K	S	6	7	2	0	1
15	16		45	46	47	48	49	50	51	52	53	54

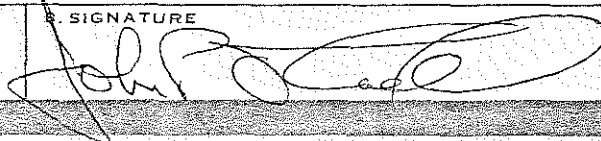
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

J. P. O'CONNELL

B. SIGNATURE



C. DATE SIGNED

11/17/80

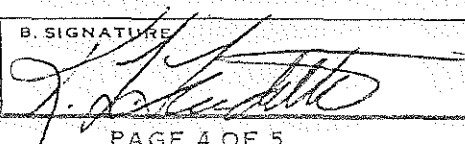
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

K. L. FREDETTE

B. SIGNATURE



C. DATE SIGNED

11/17/80

